

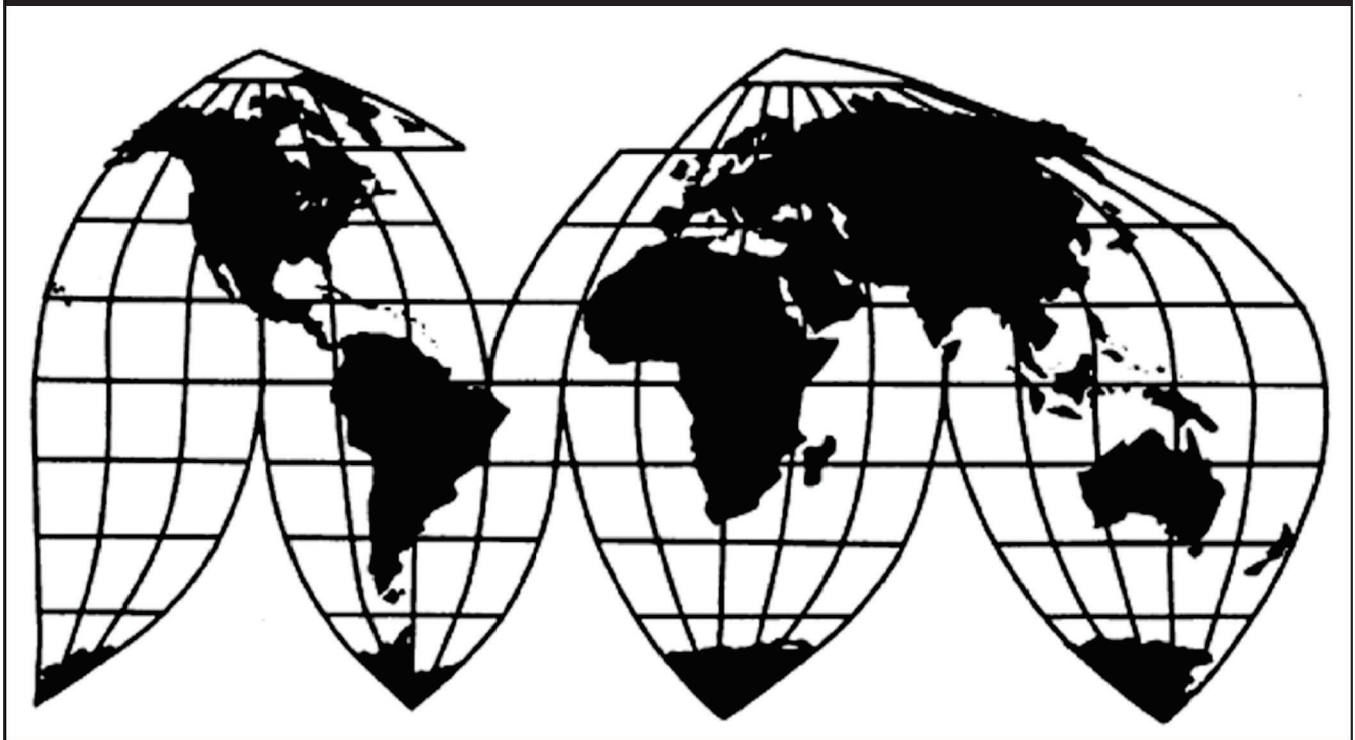
# **Oil Country Tubular Goods from Argentina, Mexico, Russia, and South Korea**

Investigation Nos. 701-TA-671-672 and 731-TA-1571-1573 (Final)

**Publication 5381**

**November 2022**

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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# U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets in confidential reports and is deleted and replaced with asterisks (\*\*\*) in public reports.

# UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-671-672 and 731-TA-1571-1573 (Final)

Oil Country Tubular Goods from Argentina, Mexico, Russia, and South Korea

## DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of oil country tubular goods from Argentina and Mexico provided for in subheadings 7304.29, 7305.20, and 7306.29 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”); by reason of imports of oil country tubular goods from Russia that have been found by Commerce to be sold in the United States at LTFV and subsidized by the government of Russia; and by reason of imports of oil country tubular goods from South Korea that have been found by Commerce to be subsidized by the government of South Korea.<sup>2 3</sup>

## BACKGROUND

The Commission instituted these investigations effective October 6, 2021, following receipt of petitions filed with the Commission and Commerce by Borusan Mannesmann Pipe U.S., Inc., Baytown, Texas; PTC Liberty Tubulars LLC, Liberty, Texas; U.S. Steel Tubular Products, Inc., Pittsburgh, Pennsylvania; Welded Tube USA, Inc., Lackawanna, New York; and the United States Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC, Pittsburgh, Pennsylvania. The final phase of the investigations was scheduled by the Commission following notification of a preliminary determination by Commerce that imports of oil country tubular goods from Russia were

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<sup>1</sup> The record is defined in § 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

<sup>2</sup> 87 FR 59041, 59045, 59047, 59054, and 59056 (September 29, 2022).

<sup>3</sup> The Commission also finds that imports subject to Commerce’s affirmative critical circumstances determinations are not likely to undermine seriously the remedial effect of the antidumping duty orders on oil country tubular goods from Mexico and Russia.

subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and preliminary determinations by Commerce that imports of oil country tubular goods from Argentina, Mexico, and Russia were sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)).<sup>4</sup> Notice of the scheduling of the final phase of the Commission's investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on June 9, 2022 (87 FR 35246). The Commission conducted its hearing on September 22, 2022. All persons who requested the opportunity were permitted to participate.

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<sup>4</sup> 87 FR 28801, 28804, and 28808 (May 11, 2022) (antidumping duty preliminary determinations) and 87 FR 14249 (March 14, 2022) (countervailing duty preliminary determination for Russia). Commerce preliminarily determined that countervailable subsidies were not being provided to producers and exporters of oil country tubular goods from South Korea. 87 FR 14248 (March 14, 2022) (countervailing duty preliminary determination for South Korea).

## Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of oil country tubular goods (“OCTG”) from Argentina, Mexico, and Russia found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value and imports of OCTG from Russia and South Korea found by Commerce to be subsidized by the governments of Russia and South Korea. We also find that critical circumstances do not exist with respect to imports of OCTG from Mexico and Russia that are subject to Commerce’s final affirmative critical circumstances determinations.

### I. Background

The petitions in these investigations were filed on October 6, 2021, by Borusan Mannesmann Pipe U.S., Inc. (“Borusan”), PTC Liberty Tubulars LLC (“PTC”), U.S. Steel Tubular Products, Inc. (“U.S. Steel”), the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC (“USW”), and Welded Tube USA, Inc. (“Welded Tube”) (collectively, “Petitioners”).<sup>1</sup> Borusan, PTC, U.S. Steel, and Welded Tube are domestic producers of OCTG; USW is a labor union representing U.S. OCTG workers. Petitioners appeared at the hearing<sup>2</sup> and submitted joint prehearing and posthearing briefs and final comments.<sup>3</sup>

The following respondent parties appeared at the hearing and submitted joint prehearing and posthearing briefs and final comments: Tenaris Bay City, Inc., Maverick Tube Corporation, and IPSCO Tubulars Inc. (“Tenaris USA”), domestic producers of OCTG; Tenaris Global Services (U.S.A.) Corporation (“TGS USA”), an importer of OCTG; Siderca S.A.I.C. (“Siderca”), a producer and exporter of OCTG in Argentina; and Tubos de Acero de Mexico, S.A.

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<sup>1</sup> Confidential Report, Memorandum INV-UU-100 (Oct. 14, 2022) (“CR”); Public Report, *Oil Country Tubular Goods from Argentina, Mexico, Russia, and South Korea*, Inv. Nos. 701-TA-671-672 and 731-TA-1571-1573 (Final), USITC Pub. 5381 (Oct. 2022) (“PR”) at I-1.

<sup>2</sup> In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its hearing on September 22, 2022, through written witness testimony and video conference, as set forth in procedures provided to the parties and announced on its website. See *Oil Country Tubular Goods from Argentina, Mexico, Russia, and South Korea; Scheduling of the Final Phase of Countervailing Duty and Anti-Dumping Duty Investigations*, 87 Fed. Reg. 35246 (Jun. 9, 2022).

<sup>3</sup> See EDIS Doc. 780224 (“Petitioners’ Prehearing Br.”); EDIS Doc. 781297 (“Petitioners’ Posthearing Br.”); and EDIS Doc. 782798 (“Petitioners’ Final Comments”).

("TAMSA"), a producer and exporter of OCTG in Mexico.<sup>4</sup> Each of these firms is a subsidiary of the holding company Tenaris SA.<sup>5</sup> Unless otherwise specified, we refer to them collectively herein as "Tenaris."

In addition to Tenaris, the Russian OCTG producer TMK Group ("TMK") also appeared at the hearing and submitted prehearing and posthearing briefs and final comments.<sup>6</sup> The government of Korea ("GOK") and South Korean producer SeAH Steel Corporation submitted separate posthearing statements.<sup>7</sup>

U.S. industry data are based on the questionnaire responses of 19 domestic producers that accounted for the large majority of domestic OCTG production in 2021.<sup>8</sup> U.S. import data are based on official Commerce import statistics, with adjustments made by Commission staff \*\*\*.<sup>9</sup>

The Commission received responses to its questionnaire from five foreign producers of subject merchandise: one producer/exporter in Argentina, accounting for \*\*\* U.S. imports of subject merchandise from Argentina in 2021;<sup>10</sup> one producer/exporter in Mexico, accounting for \*\*\* U.S. imports of subject merchandise from Mexico in 2021;<sup>11</sup> one producer/exporter in Russia, accounting for \*\*\* percent of U.S. imports of subject merchandise from Russia in 2021;<sup>12</sup> and two producers/exporters in South Korea, accounting for \*\*\* percent of U.S. imports of subject merchandise from South Korea in 2021.<sup>13</sup>

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<sup>4</sup> See EDIS Doc. 780231 ("Tenaris's Prehearing Br."); EDIS Doc. 781297 ("Tenaris's Posthearing Br."); and EDIS Doc. 781293 ("Tenaris's Final Comments").

<sup>5</sup> CR/PR at Tables III-2-4; Preliminary Phase Conference Transcript, EDIS Doc. 755274, at 164 (Curá).

<sup>6</sup> See EDIS Doc. 780232 ("TMK's Prehearing Br."); EDIS Doc. 781287 ("TMK's Posthearing Br."); and EDIS Doc. 782795 ("TMK's Final Comments").

<sup>7</sup> See EDIS Doc. 781274 ("GOK's Posthearing Statement"); EDIS Doc. 781287 ("SeAH Steel Corporation's Posthearing Statement").

<sup>8</sup> CR/PR at I-5 and III-1.

<sup>9</sup> CR/PR at I-5 and IV-1. After finding *de minimis* subsidy rates for the two individually examined South Korean respondents (Hyundai Steel and SeAH Steel) during the preliminary phase of the investigations, Commerce calculated a *de minimis* rate for only Hyundai Steel in its final determination and so disregarded subsidies to Hyundai Steel in determining countervailing duties. See *Oil Country Tubular Goods from the Republic of Korea: Final Affirmative Countervailing Duty Determination*, 87 Fed. Reg. 59056 (Sept. 29, 2022). Thus, OCTG imports from this firm are not subject to these investigations, and Commission staff have accordingly adjusted the import data by \*\*\* while other in-scope imports from South Korea are classified as subject imports.

<sup>10</sup> CR/PR at VII-3.

<sup>11</sup> CR/PR at VII-10.

<sup>12</sup> CR/PR at VII-17.

<sup>13</sup> CR/PR at VII-24. In addition to responses from the two subject producers/exporters, the Commission also received a response from nonsubject producer/exporter Hyundai Steel Company. *Id.*

## II. Domestic Like Product

### A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”<sup>14</sup> Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>15</sup> In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”<sup>16</sup>

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.<sup>17</sup> Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”<sup>18</sup> The Commission then defines the domestic like product in light of the imported articles Commerce has identified.<sup>19</sup> The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and

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<sup>14</sup> 19 U.S.C. § 1677(4)(A).

<sup>15</sup> 19 U.S.C. § 1677(4)(A).

<sup>16</sup> 19 U.S.C. § 1677(10).

<sup>17</sup> 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

<sup>18</sup> *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Cir. 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

<sup>19</sup> *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

uses” on a case-by-case basis.<sup>20</sup> No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.<sup>21</sup> The Commission looks for clear dividing lines among possible like products and disregards minor variations.<sup>22</sup>

## **B. Product Description**

Commerce defined the imported merchandise within the scope of the investigations as: {C}ertain OCTG, which are hollow steel products of circular cross-section, including oil well casing and tubing, of iron (other than cast iron) or steel (both carbon and alloy), whether seamless or welded, regardless of end finish (*e.g.*, whether or not plain end, threaded, or threaded and coupled) whether or not conforming to American Petroleum Institute (API) or non-API specifications, whether finished (including limited service OCTG products) or unfinished (including green tubes and limited service OCTG products), whether or not thread protectors are attached. The scope of the investigations also covers OCTG coupling stock.

Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise processed in a third country, including by performing any heat treatment, cutting, upsetting, threading, coupling, or any other finishing, packaging, or processing that would not otherwise remove the

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<sup>20</sup> See, *e.g.*, *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep’t of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

<sup>21</sup> See, *e.g.*, S. Rep. No. 96-249 at 90-91 (1979).

<sup>22</sup> *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; see also S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).



merchandise from the scope of the investigations if performed in the country of manufacture of the OCTG.

Excluded from the scope of the investigations are: casing or tubing containing 10.5 percent or more by weight of chromium; drill pipe; unattached couplings; and unattached thread protectors.<sup>23</sup>

OCTG are tubular steel products used in oil and gas wells and consist primarily of casing and tubing.<sup>24</sup> OCTG are manufactured by a seamless process or a welded process.<sup>25</sup> Both seamless OCTG and welded OCTG are used in drilling and conveyance applications, although seamless OCTG generally is required for use in high-pressure or sour service environments.<sup>26</sup> Casing is a circular pipe that serves as the structural retainer for the walls of the well with an outside diameter (“OD”) ranging from 4.5 to 20 inches. Casing is used in the well to provide a firm foundation for the drill string by supporting the walls of the hole to prevent caving in both during drilling and after the well is completed. After the casing is set, concrete is usually pumped between the outside of the casing and the wall of the hole to provide a secure anchor. Casing also serves as a surface pipe designed to prevent contamination of the recoverable oil and gas by surface water, gas, sand, or limestone.<sup>27</sup>

Tubing is a smaller-diameter pipe (between 1.050 and 4.500 inches in OD) installed inside a larger-diameter casing that is used to conduct the oil or gas to the surface either through natural flow or pumping. Tubing must be strong enough to support its own weight, that of the oil or gas, and that of any pumping equipment suspended on the string. Both tubing

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<sup>23</sup> *Oil Country Tubular Goods from the Republic of Korea: Final Affirmative Countervailing Duty Determination*, 87 Fed. Reg. 59056, 59057 (Sept. 29, 2022); *Oil Country Tubular Goods from the Russian Federation: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination*, 87 Fed. Reg. 59047, 59049 (Sept. 29, 2022); *Oil Country Tubular Goods from Argentina: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 87 Fed. Reg. 59054, 59055 (Sept. 29, 2022); *Oil Country Tubular Goods from Mexico: Final Affirmative Determinations of Sales at Less Than Fair Value and Critical Circumstances*, 87 Fed. Reg. 59041, 59042 (Sept. 29, 2022); *Oil Country Tubular Goods from the Russian Federation: Final Affirmative Determination of Sales at Less Than Fair Value, and Final Affirmative Critical Circumstances Determination, in Part*, 87 Fed. Reg. 59045, 59047 (Sept. 29, 2022).

<sup>24</sup> CR/PR at I-13.

<sup>25</sup> CR/PR at I-14.

<sup>26</sup> CR/PR at I-14. A sour service well contains hydrogen sulfide gas which can potentially result in sulfide stress cracking in the welded seam of welded OCTG. *Id.*

<sup>27</sup> CR/PR at I-18.

and casing are usually produced in accordance with American Petroleum Institute (“API”) standard 5CT.<sup>28</sup>

In addition, coupling stock is a seamless tubular product used to make coupling blanks which, in turn, are used to produce couplings. Couplings are thick-walled internally threaded cylinders that are used for joining two lengths of threaded OCTG and typically account for 2-3 percent of the weight of end-finished tubing or casing. Couplings are produced and certified to the same API grade and type as the OCTG to which the couplings are joined.<sup>29</sup>

### **C. Arguments of the Parties**

Petitioners argue that the Commission should define a single domestic like product coextensive with the scope, as it did in the preliminary phase of the investigations.<sup>30</sup> Petitioners note that the scope encompasses both seamless and welded OCTG, and both finished and unfinished OCTG.<sup>31</sup> Respondents do not address the issue.

### **D. Analysis**

In its preliminary determinations, the Commission found that no clear lines divided seamless and welded OCTG and defined them as a single domestic like product, based on an analysis of its traditional like product factors.<sup>32</sup> The Commission also defined finished and unfinished OCTG as a single domestic like product, based on its semi-finished products

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<sup>28</sup> CR/PR at I-18.

<sup>29</sup> CR/PR at I-20.

<sup>30</sup> Petitioners’ Prehearing Br. at 12-13.

<sup>31</sup> Petitioners’ Prehearing Br. at 13.

<sup>32</sup> *Oil Country Tubular Goods from Argentina, Mexico, Russia, and South Korea*, Inv. Nos. 701-TA-671-672 and 731-TA-1571-1573 (Preliminary), USITC Pub. 5248 (Nov. 2021) (“Preliminary Determinations”) at 9-12. Specifically, the Commission found that seamless and welded OCTG share basic physical characteristics and are both used in oil and gas wells, and that they share identical channels of distribution. *Id.* at 9-10. While the Commission acknowledged that the processes used in the initial formation of seamless and welded OCTG differ, it found that the processes used in finishing them are the same. *Id.* at 10. While the Commission further acknowledged that seamless OCTG may be required for certain more demanding applications, it observed that seamless and welded OCTG are otherwise interchangeable in a large number of applications, as reflected by producer and customer perceptions. *Id.* at 10-11. Finally, the Commission found that, while seamless OCTG is generally more expensive than welded OCTG, this price premium diminished over the preliminary phase period of investigation. *Id.* at 12. In light of the preponderance of similarities between seamless and welded OCTG, the Commission included them within a single domestic like product. *Id.*

analysis.<sup>33</sup> Accordingly, the Commission defined a single domestic like product consisting of OCTG, coextensive with the scope of the investigations.<sup>34</sup>

The record in the final phase of the investigations contains no new information or party argument that would warrant the Commission's reconsideration of its domestic like product definition from the preliminary phase of the investigations. We accordingly again define a single domestic like product consisting of all domestically produced OCTG, coextensive with Commerce's scope of the investigations.

### **III. Domestic Industry**

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."<sup>35</sup> In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

These investigations raise two separate domestic industry issues. The first concerns whether processors that heat treat OCTG engage in sufficient production-related activities to qualify as domestic producers.<sup>36</sup> The second concerns whether appropriate circumstances exist to exclude any U.S. producers from the domestic industry pursuant to the related parties provision.

#### **A. Sufficient Production-Related Activities**

In deciding whether a firm qualifies as a domestic producer of the domestic like product, the Commission generally analyzes the overall nature of a firm's U.S. production-related

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<sup>33</sup> Preliminary Determinations at 12-14. Specifically, the Commission found that unfinished OCTG is dedicated to the production of finished OCTG, that there is no separate market for unfinished OCTG, and that unfinished OCTG imparts essential characteristics to finished OCTG. *Id.* at 13. While acknowledging that there are differences in the costs and physical characteristics of unfinished and finished OCTG, and that the process of transforming the former into the latter is capital and labor intensive, the Commission found that, on balance, the record supported defining unfinished and finished OCTG as a single domestic like product. *Id.* at 14.

<sup>34</sup> Preliminary Determinations at 14.

<sup>35</sup> 19 U.S.C. § 1677(4)(A).

<sup>36</sup> Heat treatment enhances certain physical characteristics of OCTG, including yield and tensile strengths. Generally, as the depth and pressure in a well increases, heat treated OCTG would be required because of its higher strength. CR/PR at I-19.

activities, although production-related activity at minimum levels could be insufficient to constitute domestic production.<sup>37</sup>

## 1. Arguments of the Parties

Petitioners argue that processors that heat treat OCTG engage in sufficient production-related activities to be considered part of the domestic industry.<sup>38</sup> They submit that defining the domestic industry to include heat treaters in addition to OCTG mills would be “consistent with the Commission’s definition of the domestic industry in prior OCTG proceedings.”<sup>39</sup> Respondents do not address the issue.

## 2. Analysis

In its preliminary determinations, the Commission found that heat treaters engage in sufficient production-related activities to be considered domestic producers.<sup>40</sup> The record of the final phase of the investigations contains no new information or argument that would warrant the Commission’s reconsideration of its sufficient production-related activities analysis

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<sup>37</sup> The Commission generally considers six factors: (1) source and extent of the firm’s capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Crystalline Silicon Photovoltaic Cells and Modules from China*, Inv. Nos. 701-TA-481 and 731-TA-1190 (Final), USITC Pub. 4360 at 12-13 (Nov. 2012), *aff’d*, *Changzhou Trina Solar Energy Co. v. USITC*, 879 F. 3d 1377 (Fed. Cir. 2018).

<sup>38</sup> Petitioners’ Prehearing Br. at 13-14.

<sup>39</sup> Petitioners’ Prehearing Br. at 14 and n.39 (citing several past OCTG investigations and reviews).

<sup>40</sup> Preliminary Determinations at 15-18. Specifically, while noting the differences in the hourly wages paid by heat treaters and OCTG mills, the Commission observed that heat treaters still rated their production-related activities as highly complex, indicating that heat treatment requires a significant degree of technical expertise. *Id.* at 16. Likewise, the Commission observed that heat treaters reported substantial levels of capital investment and employment, and that the value added by their operations was significant. *Id.* at 16-17. While acknowledging that U.S. mills reported higher capital investment, employment, and value added than did heat treaters, the Commission found that several responding mills in fact integrated heat treatment into their operations, which would account for a portion of their reported capital investments, employment, and value added. *Id.* at 17. Finally, the Commission found that heat treaters reported the value of their domestically sourced raw materials as being substantial. *Id.* at 17-18. Based on these considerations, the Commission found that heat treaters engage in sufficient production-related activities to qualify for inclusion in the domestic industry. *Id.* at 18.

from the preliminary phase of the investigations.<sup>41</sup> We accordingly find that heat treaters engage in sufficient production-related activities to qualify for inclusion in the domestic industry.

## **B. Related Parties**

We next determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.<sup>42</sup> Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.<sup>43</sup>

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<sup>41</sup> No party requested the collection of data pertinent to a sufficient production-related activities analysis in their comments on the draft final phase questionnaires, and no such data were collected.

Heat treaters have been considered to qualify for inclusion in the domestic industry in several prior OCTG investigations. *See, e.g., Certain Oil Country Tubular Goods from China*, Inv. No. 701-TA-463 (Final), USITC Pub. 4124 (Jan. 2010) at 6; *Certain Oil Country Tubular Goods from India, Korea, the Philippines, Taiwan, Thailand, Turkey, Ukraine, and Vietnam*, Inv. Nos. 701-TA-499-500 and 731-TA-1215-1217 and 1219-1223 (Final), USITC Pub. 4489 (Sept. 2014) at 14.

<sup>42</sup> *See Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

<sup>43</sup> The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l Trade 2015), *aff'd*, 879 F. 3d 1377 (Fed. Cir. 2018); *see also Torrington Co. v. United States*, 790 F. Supp. at 1168.

Two U.S. firms (\*\*\*) are subject to the related parties provision because they imported subject merchandise during the January 2019 – June 2022 period of investigation (“POI”).<sup>44 45</sup> In addition, three firms, \*\*\*, are or may be subject to the related parties provision because they potentially control, or are controlled by, exporters or importers of subject merchandise, or because they are related to exporters or importers of subject merchandise through common

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<sup>44</sup> CR/PR at III-27; \*\*\* U.S. producer questionnaire response at III-21.

<sup>45</sup> CR/PR at III-27. Domestic producer \*\*\* did not itself import subject merchandise, but purchased subject merchandise from \*\*\* from various importers throughout the POI, and purchased subject imports from \*\*\* from importer \*\*\* in 2020. CR at Table III-23. A domestic producer shall be considered to be a related party if it directly or indirectly controls an exporter, importer, or third party. 19 U.S.C. § 1677(4)(B). A domestic producer that does not itself import subject merchandise or does not share a corporate affiliation with an importer may nonetheless be deemed a related party if it controls large volumes of subject imports. See SAA at 858. The Commission has found such control to exist, for example, where the domestic producer’s purchases were responsible for a predominant proportion of an importer’s subject imports and the importer’s subject imports were substantial. See, e.g., *Iron Construction Castings from Brazil, Canada, and China*, Inv. Nos. 701-TA-248, 731-TA-262-263, 265 (Fourth Review), USITC Pub. 4655 at 11 (Dec. 2016); *Chlorinated Isocyanurates from China and Spain*, Inv. Nos. 731-TA-1082-1083 (Second Review), USITC Pub. 4646 at 12 (Nov. 2016).

\*\*\*, which buys subject imported “green tube” (*i.e.*, unfinished OCTG) for processing into finished OCTG, purchased \*\*\* short tons in 2019, \*\*\* short tons in 2020, and \*\*\* short tons in 2021 of subject imports from \*\*\*, identifying \*\*\*. In addition \*\*\* imported \*\*\* short tons of subject imports from \*\*\* from importer \*\*\* in 2020 alone. CR/PR at Table III-23 and Note at III-30. None of the identified importers provided a response to the Commission’s U.S. importer questionnaire. Thus, we are unable to determine whether \*\*\* purchases were responsible for a predominant proportion of the individual subject importers’ subject imports. As a ratio of \*\*\* purchases to overall subject imports from \*\*\*, the purchases accounted for only \*\*\* percent in 2019, \*\*\* percent in 2020, and \*\*\* percent in 2021. Purchases of subject imports from \*\*\* in 2020 accounted for \*\*\* percent of overall subject imports from \*\*\* in 2020. See CR/PR at Table III-23. In 2020, \*\*\* percent of total subject imports. *Derived* from Tables III-23 and C-1. Based on the record, and in the absence of any contrary argument, we find that \*\*\* is not subject to the related parties provision because it does not control large volumes of subject imports. Moreover, even if it were, appropriate circumstances would not exist to exclude it from the domestic industry. While \*\*\*, a comparison of the quantity of subject imports that \*\*\* purchased from \*\*\* and \*\*\* during the POI to the total volume of imports that it processed indicate that \*\*\* primarily processed nonsubject imports. Compare CR/PR Tables III-23 and F-10 (showing that \*\*\* 2021 purchases of subject imports from \*\*\* accounted for \*\*\* percent of the total volume of imports it processed that year, and that its 2020 purchases of subject imports from \*\*\* accounted for \*\*\* percent of the total volume of imports it processed that year). Thus, \*\*\* imports of subject merchandise are unlikely to skew the data for the rest of the domestic industry.

ownership and control.<sup>46</sup> \*\*\* is also subject to the related parties provision based on the purchases of subject imports by its affiliated importer, \*\*\*.<sup>47</sup>

## 1. Arguments of the Parties

Petitioners argue that the Commission should define the domestic industry to include all domestic producers of OCTG, as it did in the preliminary phase of the investigations.<sup>48</sup>

Tenaris argues that Tenaris USA should not be excluded from the domestic industry.<sup>49</sup> Conversely, it contends that “there are grounds to consider whether” Borusan and Welded Tube should be excluded from the domestic industry, due to the former’s \*\*\* and the latter’s importation of nonsubject merchandise.<sup>50</sup>

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<sup>46</sup> \*\*\* is a member of the same corporate group as \*\*\*, which exports subject merchandise to the United States. See CR/PR at Table III-4; \*\*\* U.S. producer questionnaire response. It is unclear whether \*\*\* controls \*\*\*, or vice versa, or whether these two firms are under common control. Irrespective of whether \*\*\* is subject to the related parties provision due to a requisite control relationship, it is subject to this provision due to its importation of subject merchandise, as discussed previously.

\*\*\* is affiliated through the \*\*\* with \*\*\*, which exports subject merchandise to the United States, and with \*\*\*. See CR/PR at Tables III-3-4; \*\*\* U.S. producer questionnaire response. \*\*\* is \*\*\* percent owned by \*\*\*, and \*\*\* percent owned by \*\*\*. CR/PR at Table III-2. Deciding whether these relationships indicate a requisite control relationship is unnecessary since even assuming that \*\*\* is subject to the related parties provision, we do not find that appropriate circumstances would exist to exclude it from the domestic industry, as discussed below.

\*\*\* is a sister company of \*\*\* and \*\*\*, both of which export subject merchandise to the United States. See CR at Table III-4; \*\*\* foreign producer questionnaire response; \*\*\* foreign producer questionnaire response. \*\*\* and both \*\*\* and \*\*\* are subsidiaries of \*\*\*. See CR/PR at Tables III-2-4; Preliminary Phase Conference Transcript, EDIS Doc. 755274, at 164 (Curá). Thus, the record indicates that \*\*\* and both \*\*\* and \*\*\* are under common control.

<sup>47</sup> \*\*\* and importer \*\*\* are subsidiaries of \*\*\*, indicating they are under common control. \*\*\* reported that \*\*\* purchased subject imports from \*\*\* from importer \*\*\* in quantities of \*\*\* short tons in 2020, \*\*\* short tons in 2021, and \*\*\* short tons in interim 2022, compared to \*\*\* short tons in interim 2021. CR/PR at Table III-24. These purchases accounted for \*\*\* to \*\*\* percent of \*\*\* reported imports during these periods, and \*\*\* was responsible for \*\*\* to \*\*\* percent of total imports from \*\*\* during the periods. See *id.* Because these purchases were responsible for a predominant proportion of \*\*\* subject imports from \*\*\* and those imports were substantial, we find that \*\*\* is subject to the related parties provision based on its affiliate’s, \*\*\*, control of large volumes of \*\*\* subject imports from \*\*\* through those purchases.

<sup>48</sup> Answers to Commissioner Questions appended to Petitioners’ Posthearing Br. at II-51-52.

<sup>49</sup> Exhibit I to Tenaris’s Posthearing Br. at 7.

<sup>50</sup> Exhibit I to Tenaris’s Posthearing Br. at 9. The related parties provision of the statute allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise, or which are themselves importers of subject merchandise. 19 U.S.C. § 1677(4)(B). That Welded Tube is \*\*\*, and that Borusan is an importer of *nonsubject merchandise*, does not make either firm subject to the related parties provision.

## 2. Analysis

Based on the following analysis, we find that appropriate circumstances do not exist to exclude any domestic producer from the domestic industry under the related parties provision.<sup>51</sup>

\*\*\*. \*\*\* accounted for \*\*\* percent of U.S. mill production in 2021, making it the \*\*\* largest domestic producer of OCTG.<sup>52</sup> \*\*\* imported subject merchandise from \*\*\* in 2019 and in January – June 2022 (“interim 2022”).<sup>53</sup> The ratio of its subject imports to U.S. mill production was \*\*\* percent in 2019 and \*\*\* percent in interim 2022.<sup>54</sup> \*\*\* indicated that \*\*\*.<sup>55</sup>

In view of the fact that \*\*\* importation of subject merchandise was small in relation to its domestic production, its primary interest appears to be in domestic production. Accordingly, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. In 2019, the last year prior to its acquisition by \*\*\*, \*\*\* share of domestic mill production was \*\*\* percent, making it the \*\*\* largest domestic OCTG producer that year.<sup>56</sup> \*\*\*.<sup>57</sup> Although \*\*\* reported importing OCTG from \*\*\* in 2019, it reported the volume of its imports from all sources, subject and nonsubject.<sup>58</sup> The ratio of its imports from all sources to U.S. mill production was \*\*\* percent in 2019.<sup>59</sup> \*\*\* operating income to net sales ratio was \*\*\* the industry average in 2019.<sup>60</sup>

During the 2019 period in which \*\*\*, its primary interest appears to have been in domestic production, given that its ratio of imports from all sources to domestic production was \*\*\* and its ratio of subject imports to domestic production would have been \*\*\*. In light

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<sup>51</sup> In its preliminary determinations, the Commission found that appropriate circumstances did not exist to exclude any domestic producer, and defined the domestic industry as all U.S. producers of OCTG. See Preliminary Determinations at 18-21.

<sup>52</sup> CR/PR at Table III-1.

<sup>53</sup> CR/PR at Table III-19.

<sup>54</sup> CR/PR at Table III-19.

<sup>55</sup> CR/PR at Table III-22.

<sup>56</sup> *Derived from* \*\*\* U.S. producer questionnaire response at II-7 and CR/PR Table III-7.

<sup>57</sup> \*\*\* U.S. producer questionnaire response at I-4.

<sup>58</sup> \*\*\* U.S. producer questionnaire response at II-21. In the final phase of the investigations, \*\*\* has clarified that \*\*\*. See *Id.*

<sup>59</sup> *Derived from* \*\*\* producer questionnaire response at II-7 and II-21. \*\*\* did not report its reasons for importing subject merchandise.

<sup>60</sup> *Derived from* \*\*\* U.S. producer questionnaire response at III-9a and CR/PR Table VI-7. As a ratio to net sales, \*\*\* operating income was \*\*\* percent in 2019. *Id.*



of this, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. \*\*\* accounted for \*\*\* percent of U.S. mill production in 2021, making it the \*\*\* largest domestic producer of OCTG.<sup>61</sup> It \*\*\*.<sup>62</sup> \*\*\* imports of subject merchandise from \*\*\* were \*\*\* short tons in 2019, \*\*\* short tons in 2020, and \*\*\* short tons in 2021; they were \*\*\* short tons in interim 2022, compared to \*\*\* short tons in January – June 2021 (“interim 2021”).<sup>63</sup> The ratio of its affiliate’s subject imports to \*\*\* U.S. mill production was \*\*\* percent in 2019, \*\*\* percent in 2020, and \*\*\* percent in 2021; it was \*\*\* percent in interim 2022, compared to \*\*\* percent in interim 2021.<sup>64</sup> \*\*\* indicated that \*\*\*.<sup>65</sup> \*\*\* operating income to net sales ratio was \*\*\* the industry average in interim 2022, but was otherwise \*\*\* the industry average.<sup>66</sup>

\*\*\* ratio of subject imports to \*\*\* domestic production was high and increasing during the full years of the POI. However, \*\*\* made substantial capital expenditures in the United States during the POI, particularly in 2019 (\*\*\*),<sup>67</sup> to \*\*\*.<sup>68</sup> This reflects a certain level of commitment to domestic production. Although the question is a close one, in the absence of any arguments to the contrary, and because \*\*\* inclusion would not change the overall trends or skew the data for the domestic industry during the POI, on balance we find that appropriate circumstances would not exist to exclude it from the domestic industry.

\*\*\*. \*\*\* accounted for \*\*\* percent of U.S. mill production in 2021, and is the \*\*\* largest domestic producer of OCTG.<sup>69</sup> \*\*\*.<sup>70</sup> \*\*\* imports of subject merchandise from \*\*\* were \*\*\* short tons in 2019, \*\*\* short tons in 2020, and \*\*\* short tons in 2021; they were \*\*\* short tons in interim 2022, compared to \*\*\* short tons in interim 2021.<sup>71</sup> The ratio of \*\*\* subject imports to \*\*\* U.S. mill production was \*\*\* percent in 2019, \*\*\* percent in 2020, and \*\*\* percent in 2021; it was \*\*\* percent in interim 2022, compared to \*\*\* percent in interim

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<sup>61</sup> CR/PR at Table III-1.

<sup>62</sup> \*\*\* U.S. producer questionnaire response at I-4.

<sup>63</sup> CR/PR at Table III-20.

<sup>64</sup> CR/PR at Table III-20.

<sup>65</sup> CR/PR at Table III-22.

<sup>66</sup> CR/PR at Table VI-7. As a ratio to net sales, \*\*\* operating income was \*\*\* percent in 2019, \*\*\* percent in 2020, and \*\*\* percent in 2021; it was \*\*\* percent in interim 2022, compared to \*\*\* percent in interim 2021. *Id.*

<sup>67</sup> \*\*\* capital expenditures were \$\*\*\* in 2019, \$\*\*\* in 2020, and \$\*\*\* in 2021; they were \$\*\*\* in interim 2022, compared to \$\*\*\* in interim 2021. CR/PR at Table VI-16.

<sup>68</sup> CR/PR at Table VI-17.

<sup>69</sup> CR/PR at Table III-1.

<sup>70</sup> \*\*\* producer questionnaire response at I-4.

<sup>71</sup> CR at Table III-21.

2021.<sup>72</sup> As discussed above, \*\*\* is also subject to the related parties provision via its \*\*\* purchases of subject imports from \*\*\*.<sup>73</sup> The ratio of its affiliated importer's subject imports and purchases combined to \*\*\* U.S. mill production was \*\*\* percent in 2019, \*\*\* percent in 2020, and \*\*\* percent in 2021; it was \*\*\* percent in interim 2022, compared to \*\*\* percent in interim 2021.<sup>74</sup> \*\*\* indicated that \*\*\*.<sup>75</sup> \*\*\*<sup>76</sup> operating income to net sales ratio was \*\*\* the industry average throughout the POI.<sup>77</sup>

\*\*\* ratio of subject imports and purchases to \*\*\* domestic production increased irregularly from 2019 to 2021. However, \*\*\* is \*\*\* U.S. producer and \*\*\* made \*\*\* capital expenditures in the United States throughout the POI, including by \*\*\*.<sup>78</sup> This reflects a certain level of commitment to domestic production. Moreover, as \*\*\* is \*\*\* U.S. producer, its exclusion would risk creating an incomplete picture of the U.S. industry during the POI. Additionally, as noted above, no party argued to exclude it from the domestic industry. For these reasons, we find on balance that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

In sum, based on the foregoing and in the absence of contrary argument, we find that appropriate circumstances do not exist to exclude any firm from the domestic industry under the related parties provision. Accordingly, based on our definition of the domestic like product, we define the domestic industry to include all U.S. producers of OCTG.

#### IV. Cumulation<sup>79</sup>

For purposes of evaluating the volume and effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to

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<sup>72</sup> CR/PR at Table III-21.

<sup>73</sup> CR/PR at Table III-24.

<sup>74</sup> *Derived from* CR/PR at Tables III-21 and III-24.

<sup>75</sup> CR/PR at Table III-22.

<sup>76</sup> \*\*\*. CR/PR at VI-1, n.3. To analyze the financial data from \*\*\* over the POI with more consistency, these data have been combined. *Id.*

<sup>77</sup> CR/PR at Table VI-7. As a ratio to net sales, \*\*\* operating income was \*\*\* percent in 2019, \*\*\* percent in 2020, and \*\*\* percent in 2021; it was \*\*\* percent in interim 2022, compared to \*\*\* percent in interim 2021. *Id.*

<sup>78</sup> CR/PR at Table VI-17. \*\*\* capital expenditures were \$\*\*\* in 2019, \$\*\*\* in 2020, and \$\*\*\* in 2021. They were \$\*\*\* in interim 2022, compared to \$\*\*\* in interim 2021. *Id.* at Table VI-16.

<sup>79</sup> Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible. 19 U.S.C. §§ 1673d(b), 1677(24)(A)(i). (Continued...)

cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.<sup>80</sup>

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.<sup>81</sup> Only a “reasonable overlap” of competition is required.<sup>82</sup>

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During the most recent 12-month period preceding the filing of the petitions in these investigations (October 2020 through September 2021), subject imports from Argentina accounted for 8.4 percent of total imports, subject imports from Mexico accounted for 18.7 percent of total imports, subject imports from Russia (both for the antidumping and countervailing duty investigations) accounted for 7.1 percent of total imports, and subject imports from South Korea accounted for \*\*\* percent of total imports. CR/PR at Table IV-8. Because imports for all subject countries exceed the negligibility threshold, we find that imports for each subject investigation are not negligible.

<sup>80</sup> See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int’l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

<sup>81</sup> See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

<sup>82</sup> The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902; see *Goss* (Continued...))

## A. Arguments of the Parties

Petitioners argue that the Commission should cumulate imports from all subject countries as it did in the preliminary determinations because the petitions were filed on the same day and there is a reasonable overlap of competition between and among the domestic like product and imports from each subject country. Specifically, Petitioners contend that subject imports from each source and the domestic like product are fungible, share common channels of distribution, are sold in overlapping geographic regions, and were simultaneously present throughout the POI.<sup>83</sup>

Tenaris argues that imports from Argentina and Mexico should not be cumulated with imports from South Korea. Imports from Argentina and Mexico, it contends, primarily comprise seamless OCTG sold to end users, while imports from South Korea primarily comprise welded OCTG sold to distributors.<sup>84</sup> Tenaris further argues that the higher average unit values (“AUVs”) for imports from Argentina and Mexico relative to other subject imports reflect a lack of fungibility between imports from Argentina and Mexico and other subject imports.<sup>85</sup>

Tenaris and TMK argue that imports from Russia should not be cumulated, as “regulations, sanctions, and other obstacles ... prevent such products from meaningfully competing with subject merchandise from Argentina, Mexico, and South Korea and with domestically produced {OCTG}.”<sup>86</sup> Of particular note, according to TMK, is that, as of March 2022, \*\*\*.<sup>87</sup> TMK also emphasizes that the United States’ suspension of normal trade relations

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*Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int’l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”).

<sup>83</sup> Petitioners’ Prehearing Br. at 15-22.

<sup>84</sup> Petitioners’ Prehearing Br. at 35-40. Tenaris contends that only seamless and not welded OCTG can be used in certain more demanding applications, such as in high-pressure or sour service environments. See Petitioners’ Prehearing Br. at 37.

<sup>85</sup> Petitioners’ Prehearing Br. at 38.

<sup>86</sup> See TMK’s Prehearing Br. at 3; See also Tenaris’s Prehearing Br. at 40-41. While conceding that these obstacles to competition arose only late in the POI – *i.e.*, subsequent to Russia’s February 2022 invasion of Ukraine – TMK asserts that the relevant time period for assessing whether a reasonable overlap of competition exists for imports from Russia is from February 2022 onwards, as “consideration of the competitiveness of Russian subject merchandise in the U.S. marketplace prior to February 2022 provides little guidance” as to the current conditions of competition for these imports. *Id.* at 3-4. We disagree with TMK that we should focus our assessment of whether there is a reasonable overlap of competition from February 2022 onward and disregard data covering the majority of the POI. As discussed below, based on the record in these investigations, we find that there is a reasonable overlap of competition between subject imports from Russia and other subject countries.

<sup>87</sup> See TMK’s Prehearing Br. at 5-6; See also CR/PR at VII-17, n.19.

with Russia has resulted in high “Column 2” duties on OCTG from Russia, whereas OCTG from other subject sources enjoy lower general duty rates.<sup>88</sup>

## B. Analysis

We consider subject imports from Argentina, Mexico, Russia, and South Korea on a cumulated basis because the statutory criteria for cumulation are satisfied. As an initial matter, Petitioners filed the antidumping and countervailing duty petitions on the same day, October 6, 2021.<sup>89</sup> There also is a reasonable overlap of competition between subject imports from Argentina, Mexico, Russia, and South Korea, and among subject imports from each source and the domestic like product, as discussed below.

*Fungibility.* Majorities of responding domestic producers, importers, and purchasers, when comparing the domestic like product with imports of OCTG from each subject country and when comparing imports from the subject countries with each other, reported that these products are always or frequently interchangeable.<sup>90</sup> Likewise, majorities of responding domestic producers, importers, and purchasers reported that factors other than price are only sometimes or never significant in purchasing decisions between and among imports from each subject country and the domestic like product.<sup>91</sup> Moreover, majorities or pluralities of responding purchasers rated imports from each source as comparable with both each other and the domestic like product with respect to at least 14 of 15 purchasing factors.<sup>92</sup> Consistent with these responses, the record shows that there was a substantial degree of overlap between U.S. shipments of subject imports from each source and domestically produced OCTG in terms of end finish, grade, and product type in 2021,<sup>93</sup> and that all OCTG, regardless of source, is

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<sup>88</sup> TMK’s Prehearing Br. at 5-8. TMK also argues that OCTG from Russia is unable to compete with other subject imports because it is subject to 25 percent *ad valorem* duties under Section 232 of the Trade Expansion Act of 1962 (“Section 232”), whereas subject imports from Argentina and South Korea are subject to absolute quotas under Section 232, and subject imports from Mexico are exempted from such duties and quotas. *Id.* at 8-9.

<sup>89</sup> None of the statutory exceptions to cumulation apply.

<sup>90</sup> CR/PR at Tables II-15-17.

<sup>91</sup> CR/PR at Tables II-18-20.

<sup>92</sup> CR/PR at Table II-14.

<sup>93</sup> CR/PR at Tables IV-14-16.

generally produced in accordance with API standards.<sup>94</sup> <sup>95</sup> We also note that there were imports of seamless OCTG from each subject source throughout the POI, and that the domestic industry produced seamless OCTG throughout this period.<sup>96</sup>

We are unpersuaded by Tenaris’s argument that imports from Argentina and Mexico are not fungible with imports from Russia or South Korea. Majorities of responding domestic producers, importers, and purchasers reported that subject imports from both Argentina and Mexico are always or frequently interchangeable with subject imports from both Russia and South Korea.<sup>97</sup> Likewise, majorities of responding domestic producers, importers, and purchasers reported that differences other than price are only sometimes or never significant when choosing between and among subject imports from the four sources.<sup>98</sup> Moreover, majorities or pluralities of responding purchasers rated subject imports from both Argentina and Mexico as comparable with subject imports from both Russia and South Korea with respect to at least 14 of 15 purchasing factors.<sup>99</sup> Consistent with these responses, there was a substantial degree of overlap between U.S. shipments of subject imports from all four sources in terms of end finish, grade, and product type in 2021.<sup>100</sup>

Although subject imports from South Korea primarily consist of welded OCTG, whereas subject imports from Argentina and Mexico primarily or exclusively consist of seamless OCTG,<sup>101</sup> we find that there remains a sufficient degree of fungibility between the imports for purposes of cumulation. Although certain applications may require seamless OCTG, such as high pressure and many sour service environments, the record indicates that welded and seamless OCTG can be used interchangeably in most if not all other applications. For example,

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<sup>94</sup> CR/PR at I-18. An exception is “limited service” OCTG, which is OCTG that does not meet API specifications, but which can still be used in certain OCTG applications. *Id.* at I-21. Additionally, while certain types of “green tube” may meet basic API standards such as diameter and wall thickness, it is not sold as meeting any particular API grade. *Id.* at I-19-20.

<sup>95</sup> While it may be that \*\*\*, this does not mean that these products are not manufactured to API standards. Indeed, among those purchasers that reported having knowledge of this issue, the vast majority, 15 of 17, reported that OCTG from Russia always or usually meets minimum quality specifications. CR/PR at Table II-12. Likewise, the vast majority of responding purchasers, 13 of 15, rated OCTG from Russia as comparable to the domestic like product – which is generally produced to API specifications – with respect to quality meets industry standards. *Id.* at Table II-14.

<sup>96</sup> CR/PR at Tables III-8 and IV-5.

<sup>97</sup> CR/PR at Tables II-15-17.

<sup>98</sup> CR/PR at Tables II-18-20.

<sup>99</sup> CR/PR at Table II-14.

<sup>100</sup> CR/PR at Tables IV-14-16.

<sup>101</sup> CR/PR at Tables IV-5, IV-6, and IV-13. Over the POI, subject imports from Mexico primarily comprised seamless OCTG, and subject imports from Argentina exclusively comprised seamless OCTG. *Id.*

both welded and seamless OCTG can meet the specifications for the majority of API grades, suggesting that either form can be used in the majority of applications.<sup>102</sup> Likewise, a representative of respondent TMK stated that “customers can use either ERW *{i.e., welded OCTG}* or seamless OCTG for most applications.”<sup>103</sup> Consistent with this evidence, the Commission has found seamless and welded OCTG to be largely fungible and interchangeable in previous investigations and five-year reviews,<sup>104</sup> and the current record does not suggest that the characteristics or uses of seamless and welded OCTG have changed since these prior determinations such that a different conclusion is warranted.<sup>105</sup>

We are also unpersuaded by Tenaris’s argument that the higher AUVs of subject imports from Argentina and Mexico compared to the AUVs of subject imports from Russia and South Korea reflect a lack of fungibility. While we acknowledge there are differences in the AUVs between these countries, the information discussed above indicates that there is a substantial degree of fungibility between and among subject imports from all four sources, notwithstanding such differences.

In light of all the above, we find that imports of OCTG from each subject source are sufficiently fungible with each other and the domestic like product to support a finding of a reasonable overlap of competition.

*Channels of Distribution.* Domestic producers and importers of subject merchandise from Russia and South Korea primarily sold OCTG to \*\*\* over the POI while also selling a

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<sup>102</sup> CR/PR at Table I-18-19.

<sup>103</sup> Exhibit 1 to TMK’s Prehearing Br. at para. 6 (Declaration of Evgeniya Capaeva, Head of Commercial and Industrial Policy at TMK). “ERW” refers to electric resistance welding, the manufacturing process used to make welded OCTG. See CR/PR at I-21.

<sup>104</sup> See, e.g., *Certain Oil Country Tubular Goods from India, Korea, The Philippines, Saudi Arabia, Taiwan, Thailand, Turkey, Ukraine, and Vietnam*, Inv. Nos. 701-TA-499-500 and 731-TA-1215-1223 (Preliminary), USITC Pub. No. 4422 (Aug. 2013) at 10 (“There is a large degree of interchangeability between the two products, although welded OCTG cannot be used in certain demanding applications.”). See also *Oil Country Tubular Goods from Argentina, Austria, Italy, Japan, Korea, Mexico, and Spain*, Inv. Nos. 701-TA-363-364 and 731-TA-711-717 (Preliminary) USITC Pub. No. 2803 (Aug. 1994) at I-9 (“The API specifications for most grades of OCTG provide that either welded or seamless products are acceptable ... which indicates that they are interchangeable. Because of technological developments in the production of welded OCTG, it is now possible for welded OCTG to be made as a higher strength corrosion resistant product and it therefore can be used in many of the same applications as seamless OCTG.”). See further *Oil Country Tubular Goods from India, Korea, Turkey, Ukraine, and Vietnam*, Inv. Nos. 701-TA-499-500 and 731-TA-1215-1216, 1221-1223 (Review), USITC Pub. 5090 (Jul. 2020) at 16 (“While the record shows that in 2019 Ukraine was the sole subject source whose imports were principally seamless OCTG, this does not meaningfully limit its fungibility with other subject imports. Although welded and seamless OCTG are not interchangeable for all applications, the record indicates that either form can be used in the most common grades for most applications.”).

<sup>105</sup> CR/PR at I-13-28.

smaller amount to \*\*\*.<sup>106</sup> Importers of subject merchandise from Argentina and Mexico primarily sold OCTG to \*\*\* while also selling a smaller amount to \*\*\*.<sup>107</sup> Thus, the domestic like product and subject imports from each country source were sold through overlapping channels of distribution during the POI.<sup>108</sup>

*Geographic Overlap.* Domestically produced OCTG and subject imports from both Argentina and Mexico were sold in all geographic areas of the United States over the POI.<sup>109</sup> Subject imports from Russia were sold in the Mountain and Central Southwest regions, and subject imports from South Korea were sold in the Northeast, Midwest, Southeast, Central Southwest, and Mountain regions during the period.<sup>110</sup> The record also shows that nearly all subject imports from all four sources entered the United States through the Southern border of entry.<sup>111</sup> The record thus shows that imports from each subject country and domestically produced OCTG were sold in overlapping geographical areas.

*Simultaneous Presence in Market.* The domestic like product and subject imports from all subject countries were simultaneously present throughout almost the entire POI.<sup>112</sup>

We are unpersuaded by Tenaris's and TMK's argument that measures taken in response to Russia's February 2022 invasion of Ukraine have prevented subject imports from Russia from competing in the U.S. market such that cumulation of these imports is inappropriate.<sup>113</sup> These measures did not prevent such imports from entering and being sold in the United States in

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<sup>106</sup> CR/PR at Table II-1.

<sup>107</sup> CR/PR at Table II-1.

<sup>108</sup> We are unpersuaded by Tenaris's argument that subject imports from Argentina and Mexico do not sufficiently share channels of distribution with subject imports from Russia or South Korea to support a finding of a reasonable overlap of competition. A \*\*\* share of subject imports from Mexico (\*\*% percent in 2021), and \*\*\* share of subject imports from Argentina (\*\*% percent in 2021), were sold to distributors, as were \*\*\* subject imports from both Russia and South Korea. CR/PR at Table II-1.

<sup>109</sup> CR/PR at Table II-2.

<sup>110</sup> CR/PR at Table II-2.

<sup>111</sup> CR/PR at Table IV-17.

<sup>112</sup> CR/PR at Tables IV-18 and V-6-14. Subject imports from Argentina were present in 37 of 42 months, subject imports from Mexico were present in 42 of 42 months, subject imports from Russia were present in 38 of 42 months, and subject imports from South Korea were present in 42 of 42 months. *Id.* at Table IV-18. The domestic like product was present throughout the POI. *Id.* at Tables V-6-14.

<sup>113</sup> We are also unpersuaded by TMK's argument that section 232 duties of 25 percent on OCTG imported from Russia has rendered such imports uncompetitive with other subject imports in the U.S. market. See TMK's Prehearing Br. at 8-9. Although most responding domestic producers, importers, and purchasers reported that the section 232 duties had effects in the U.S. market, CR/PR at II-4-5, the duties did not prevent subject imports from Russia from entering the U.S. market in significant volumes throughout the POI, or from being present in the U.S. market for 38 months of the 42-month POI. See *Id.* at Tables IV-3, 18.



significant quantities from February 2022 to the end of the POI. Indeed, significant volumes of OCTG from Russia entered in two out of the four post-invasion months of the POI (March and May of 2022).<sup>114</sup> Just as importantly, we observe that none of the additional measures emphasized by Tenaris and TMK prohibit the entry or sale of Russian OCTG,<sup>115</sup> and that the market impact of \*\*\* is not yet clear, particularly in light of continued subject imports from Russia after March 2022.<sup>116</sup>

*Conclusion.* The record shows that imports from Argentina, Mexico, Russia, and South Korea are fungible with each other and the domestic like product. The record also shows that imports from each subject country and the domestic like product overlapped with respect to channels of distribution and geographic markets and were simultaneously present throughout nearly the entire POI. Because the record shows a reasonable overlap of competition between and among domestically produced OCTG and imports from each subject country, we cumulate subject imports from Argentina, Mexico, Russia, and South Korea for purposes of our analysis of whether the domestic industry is materially injured by reason of subject imports.<sup>117</sup>

## V. Material Injury by Reason of Subject Imports

Based on the record in the final phase of these investigations, we find that an industry in the United States is materially injured by reason of cumulated subject imports of OCTG from Argentina, Mexico, Russia, and South Korea.

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<sup>114</sup> CR/PR at Table IV-18. We note that the volume of subject imports from Russia, as well as the U.S. shipments of these imports, were higher in interim 2022 than in interim 2021, by \*\*\* percent and \*\*\* percent, respectively. CR/PR at Tables IV-2 and G-4.

<sup>115</sup> In the context of a review of an antidumping duty order on products from Iran, the Commission observed that, while sanctions on that country that did not amount to an absolute embargo on such products “may require some additional efforts by Iranian producers to export to the United States,” they were “not likely to preclude exporters of subject merchandise from participating in the U.S. market.” See *Raw In-Shell Pistachios from Iran*, Inv. No. 731-TA-287 (Second Review), USITC Pub. 4701 (Jun. 2017) at 19.

<sup>116</sup> We also note Petitioners’ argument that the \*\*\* would not eliminate Russian-produced OCTG from being sold in the U.S. market with the \*\*\*. According to Petitioners, Russian producers can still sell green tubes to API-certified processors in the United States or a third country, and once those green tubes are processed, the finished OCTG can be stenciled with the \*\*\* by the processor and sold in the U.S. market. See Answers to Commissioner Questions Appended to Petitioners’ Posthearing Br. at II-55-56.

<sup>117</sup> Respondents argue that subject import volume from Argentina, Mexico, Russia, and South Korea, considered individually, was not significant for various reasons. See, e.g., Tenaris’s Prehearing Br. at 44-50; TMK’s Prehearing Br. at 14-15, and the GOK’s Posthearing Statement at 1. Because we consider subject import volume on a cumulated basis, we do not find these arguments concerning subject imports from specific countries relevant or persuasive.

## A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.<sup>118</sup> In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.<sup>119</sup> The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”<sup>120</sup> In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.<sup>121</sup> No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>122</sup>

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,<sup>123</sup> it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.<sup>124</sup> In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.<sup>125</sup>

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<sup>118</sup> 19 U.S.C. §§ 1671d(b), 1673d(b).

<sup>119</sup> 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

<sup>120</sup> 19 U.S.C. § 1677(7)(A).

<sup>121</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>122</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>123</sup> 19 U.S.C. §§ 1671d(b), 1673d(b).

<sup>124</sup> *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

<sup>125</sup> The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than (Continued...)”

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.<sup>126</sup> In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.<sup>127</sup> Nor does the “by reason of” standard require that unfairly traded imports be the “principal” cause of

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fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred “by reason of” the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” See also *Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

<sup>126</sup> SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); accord *Mittal Steel*, 542 F.3d at 877.

<sup>127</sup> SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); see also *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), citing *Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.<sup>128</sup> It is clear that the existence of injury caused by other factors does not compel a negative determination.<sup>129</sup>

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”<sup>130</sup> The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”<sup>131</sup> The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”<sup>132</sup>

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.<sup>133</sup> Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.<sup>134</sup>

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<sup>128</sup> S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

<sup>129</sup> See *Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

<sup>130</sup> *Mittal Steel*, 542 F.3d at 876 & 78; see also *id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”), citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comports with the Court’s guidance in *Mittal*.

<sup>131</sup> *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

<sup>132</sup> *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); see also *Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

<sup>133</sup> We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

<sup>134</sup> *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

## **B. Conditions of Competition and the Business Cycle**

The following conditions of competition inform our analysis of whether there is material injury by reason of subject imports.

### **1. Demand Considerations**

Demand for OCTG is driven by oil and gas prices as well as exploration and production.<sup>135</sup> The active U.S. rig count, an indicator of oil and gas production in the United States, decreased from January 2019 to an historic low in August 2020.<sup>136</sup> After August 2020, the active U.S. rig count recovered through the end of the POI, while remaining below its 2019 levels.<sup>137</sup> Similarly, U.S. oil and gas prices fell irregularly from January 2019 to mid-2020, and then increased irregularly through the end of the POI.<sup>138</sup>

Most responding U.S. producers and importers reported decreasing or fluctuating demand for OCTG since January 1, 2019, while most responding purchasers reported increasing demand.<sup>139</sup> Petitioners and Tenaris agree that OCTG demand in the United States, after declining through August 2020 due to the COVID-19 pandemic, recovered thereafter through the end of the POI.<sup>140</sup>

Apparent U.S. consumption of OCTG decreased from 5.3 million short tons in 2019 to 2.7 million short tons in 2020, before increasing to 3.5 million short tons in 2021, a level 33.4 percent lower than in 2019. It was 70.6 percent higher in interim 2022, at 2.4 million short tons, than in interim 2021, at 1.4 million short tons.<sup>141</sup>

### **2. Supply Considerations**

The domestic industry was the largest supplier of OCTG to the U.S. market throughout the POI. Its share of the U.S. market decreased by 8.2 percentage points from 2019 to 2021, increasing from 56.7 percent in 2019 to 60.4 percent in 2020, before decreasing to 48.4 percent

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<sup>135</sup> CR/PR at II-1 and II-19.

<sup>136</sup> CR/PR at II-19, Table II-5, and Figure II-2.

<sup>137</sup> CR/PR at II-19, Table II-5, and Figure II-2.

<sup>138</sup> CR/PR at Tables E-1-2.

<sup>139</sup> CR/PR at Table II-8.

<sup>140</sup> Petitioners' Prehearing Br. at 22-23; Tenaris's Prehearing Br. at 16-17. Petitioners and Tenaris disagree as to the extent of this demand recovery, with Petitioners emphasizing that the active U.S. rig count was still lower at the end of the POI than at the beginning, and Tenaris emphasizing that a domestic producer reported experiencing "unprecedented demand" in 2022. See Petitioners' Prehearing Br. at 23; Tenaris's Prehearing Br. at 22.

<sup>141</sup> CR/PR at Table IV-19.

in 2021. Its share was slightly higher, at 51.2 percent, in interim 2022, than in interim 2021, at 50.6 percent.<sup>142</sup> While several U.S. producers reported plant closings, shutdowns, and curtailments,<sup>143</sup> and eight of 14 responding U.S. producers reported supply constraints since January 1, 2019,<sup>144</sup> most purchasers rated both the availability and the reliability of supply of domestically produced OCTG as superior or comparable to that of subject imports from each source,<sup>145</sup> and domestic producers reported \*\*\*.<sup>146</sup>

Cumulated subject imports were the second largest source of supply to the U.S. market in 2021 and the third largest source throughout the remainder of the POI. Their share of apparent U.S. consumption decreased from \*\*\* percent in 2019 to \*\*\* percent in 2020, and then increased to \*\*\* percent in 2021, a level \*\*\* percentage points greater than in 2019. Their share of apparent U.S. consumption was lower in interim 2022, at \*\*\* percent, than in interim 2021, at \*\*\* percent.<sup>147</sup> Cumulated subject imports consisted of both welded and seamless OCTG throughout the POI.<sup>148</sup> Twenty-two of 27 responding purchasers reported that the availability of subject imports of OCTG had changed, citing factors such as the COVID-19 pandemic and the Russia-Ukraine War.<sup>149</sup> \*\*\*, a domestic producer and importer of subject imports from \*\*\*, reported supply constraints due to the COVID-19 pandemic.<sup>150</sup> \*\*\*, an importer of subject merchandise from \*\*\*, reported supply constraints due to the unavailability of hot-rolled coil (“HRC”).<sup>151</sup>

Nonsubject imports were the third largest source of supply to the U.S. market in 2021 and the second large source throughout the remainder of the POI. Their share of apparent U.S. consumption declined from \*\*\* percent in 2019 to \*\*\* percent in 2020, and to \*\*\* percent in 2021, a level \*\*\* percentage points lower than in 2019. Their share of apparent U.S. consumption was greater in interim 2022, at \*\*\* percent, than in interim 2021, at \*\*\*

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<sup>142</sup> CR/PR at Table IV-19.

<sup>143</sup> CR/PR at Table III-5.

<sup>144</sup> CR/PR at II-12.

<sup>145</sup> CR/PR at Table II-14. Additionally, certain purchasers reported that supply constraints were experienced “globally” by domestic producers and importers of subject (and nonsubject) merchandise alike. *See, e.g.*, CR/PR at II-14 (purchaser \*\*\* reporting that it had been put on allocation by almost all of its suppliers, both domestic and foreign) and at II-15 (purchaser \*\*\* reporting that supply constraints occurred “globally” because of global supply chain issues).

<sup>146</sup> CR/PR at Table III-8.

<sup>147</sup> CR/PR at Table IV-19.

<sup>148</sup> CR/PR at Tables IV-5-6.

<sup>149</sup> CR/PR at II-15.

<sup>150</sup> CR/PR at II-13-14.

<sup>151</sup> CR/PR at II-13.

percent.<sup>152</sup> The largest sources of nonsubject imports were Austria, Canada, Taiwan, and \*\*\*.<sup>153</sup>

### 3. Substitutability and Other Conditions

We find that there is a moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports.<sup>154</sup> We recognize that certain factors may limit the substitutability between the domestic like product and cumulated subject imports to some degree. In particular, the record indicates that certain specific OCTG products, at least at times, are unavailable from the domestic industry, and that some purchasers reported that considerations other than price, such as size and heat treatment, influence their purchasing decisions.<sup>155</sup>

As discussed above, majorities of responding domestic producers, importers, and purchasers reported that the domestic like product is always or frequently interchangeable with imports from each of the subject countries.<sup>156</sup> Likewise, majorities of responding domestic producers, importers, and purchasers reported that factors other than price are only sometimes or never significant in purchasing decisions between the domestic like product and imports from each subject source.<sup>157</sup> Moreover, majorities or pluralities of responding purchasers rated the domestic like product as comparable with imports from each subject source with respect to at least 14 of 15 purchasing factors.<sup>158</sup> Further, OCTG, regardless of source, is generally produced to API specifications,<sup>159</sup> and there was a substantial degree of overlap between U.S. shipments of subject imports from each source and domestically produced OCTG in terms of end finish, grade, and product type in 2021.<sup>160</sup>

We also find that price is an important factor in OCTG purchasing decisions. Price/cost, along with quality/performance, was cited by purchasers most frequently as being among the

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<sup>152</sup> CR/PR at Table IV-19.

<sup>153</sup> CR/PR at II-12.

<sup>154</sup> CR/PR at II-26.

<sup>155</sup> CR/PR at II-26.

<sup>156</sup> CR/PR at Tables II-15-17.

<sup>157</sup> CR/PR at Tables II-18-20.

<sup>158</sup> CR/PR at Table II-14.

<sup>159</sup> CR/PR at I-18.

<sup>160</sup> CR/PR at Tables IV-14-16. We also note that the majority of the OCTG that was domestically produced in 2021, and the majority of the OCTG that was imported from cumulated subject sources that year, was seamless OCTG. *See id.* at Table IV-13.

top three factors influencing their OCTG purchasing decisions.<sup>161</sup> Further, price was a factor that many responding purchasers cited as being very important to their purchasing decisions, although a greater number of purchasers cited availability, delivery time, product consistency, quality meets industry standards, and reliability of supply as very important purchasing factors.<sup>162</sup> Moreover, as previously discussed, majorities of responding U.S. producers, importers, and purchasers reported that factors other than price are only sometimes or never significant in OCTG purchasing decisions.<sup>163</sup>

U.S. producers sold a plurality of their OCTG in 2021 under short-term contracts, with most of the rest of their sales under long-term contracts or spot sales. Importers sold most of their OCTG in 2021 under long-term contracts, followed by spot sales, and then short-term contracts.<sup>164</sup> Most U.S. producers' and importers' short-term contracts did not allow price renegotiation, and fixed quantity, while U.S. producers' and importers' long-term contracts did allow price renegotiation, and usually did not fix quantity.<sup>165</sup>

Other than in 2020, raw material costs accounted for the largest share of the domestic industry's cost of goods sold ("COGS") throughout the POI.<sup>166</sup> Welded OCTG is made from HRC, while seamless OCTG is made from steel billets.<sup>167</sup> The U.S. price for HRC decreased irregularly

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<sup>161</sup> CR/PR at Table II-10. Twenty firms each cited price/cost and quality/performance as among the top three factors influencing their purchasing decisions. The next most frequently cited factor was availability (18 firms). *Id.*

<sup>162</sup> CR/PR at Table II-11.

<sup>163</sup> CR/PR at Tables II-18-20.

<sup>164</sup> CR/PR at Table V-5.

<sup>165</sup> CR/PR at V-11. Tenaris argues that unlike the rest of the domestic industry, which sells to end users primarily through independent distributors, Tenaris USA sells to end users through its U.S. sales affiliate, TGS USA, a distribution model Tenaris calls its "Rig Direct" program. *See* Tenaris's Prehearing Br. at 10-11. Tenaris states that Tenaris USA sells both domestic and subject imported OCTG to end users through its Rig Direct program. It further suggests that the Rig Direct model is superior to the distribution model used by other U.S. producers, as it "allows Tenaris's customers to forgo maintaining inventory at their wells and allows them to receive delivery of OCTG with 48- or 72-hour notice," and provides them with "technical advice and assistance." *Id.*

Petitioners argue that "domestic OCTG mills and their distributors provide the same services to end users as Tenaris selling subject imports under the Rig Direct program." Petitioners' Posthearing Br. at 5. Petitioners emphasize in this respect that purchasers reported the domestic like product as being superior or comparable to subject imports "in an array of non-price purchasing factors," including delivery terms and technical support/service. *Id.* at 6. They also highlight the hearing testimony of an industry witness stating that "Tenaris has not reinvented the OCTG distribution business. They've simply rebranded it." *Id.* (*citing* Tr. at 88 (Mendenhall)).

We address this argument in further detail below.

<sup>166</sup> CR/PR at Table VI-1.

<sup>167</sup> CR/PR at I-13 and V-1.



from 2019 to mid-2020, then increased substantially through mid-2021, before falling irregularly to the end of the POI, for an overall increase of \*\*\* percent between January 2019 and June 2021.<sup>168</sup> The U.S. price for scrap (used to make steel billets) followed a directionally similar, but much less pronounced, trend over the same period.<sup>169</sup> On a per short ton basis, raw material costs for domestically produced OCTG increased irregularly from 2019 to 2021, and were significantly higher in interim 2022 than in interim 2021.<sup>170</sup>

Inventories of OCTG are held domestically by U.S. producers, distributors, importers, and end users.<sup>171</sup> As reported by \*\*\*, after small fluctuations from January 2019 through March 2021, inventories held by end users and distributors began rising, reaching \*\*\* net tons in January 2022, and growing at a slower rate thereafter.<sup>172</sup>

Based on data derived from \*\*\*, Tenaris provided a chart graphing OCTG inventories over the POI.<sup>173</sup> This chart indicates that there was an increase in OCTG inventories between March and September of 2020, with inventories decreasing to below March of 2020 levels by December of 2020.<sup>174</sup>

OCTG imports from Russia are subject to 25 percent *ad valorem* duties pursuant to Section 232.<sup>175</sup> OCTG imports from Argentina and South Korea are subject to annual import quotas pursuant to Section 232.<sup>176</sup> OCTG imports from Mexico are currently exempted from Section 232 duties and quotas.<sup>177</sup>

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<sup>168</sup> CR/PR at Table V-1 and Figure V-1.

<sup>169</sup> CR/PR at Table V-1 and Figure V-1.

<sup>170</sup> CR/PR at Table VI-1.

<sup>171</sup> CR/PR at II-16.

<sup>172</sup> CR/PR at II-16. On a months-on-hand basis, based on \*\*\* reporting, this inventory rose from \*\*\* months in January 2019 to \*\*\* months in August 2020, before declining to \*\*\* months in December 2021 and \*\*\* months in June 2022. CR/PR at II-16 at n.18; Months on Hand Inventory Worksheet, EDIS Doc. 781460.

<sup>173</sup> Tenaris's Prehearing Br. at 28. This chart does not indicate which market participants hold these inventories.

<sup>174</sup> See Tenaris's Prehearing Br. at 28 (yellow line graphing U.S. OCTG inventories in chart titled "US OCTG Inventory, Prices, & Months of Supply 2017-2022").

<sup>175</sup> CR/PR at I-12. Additionally, Tenaris asserts that subject imports from Russian producer \*\*\* for most of the POI. See Tenaris's Prehearing Br. at 40-41.

<sup>176</sup> CR/PR at I-12. The import quota is 163,102 short tons per year for Argentina, and 508,020 short tons per year for South Korea. *Id.* OCTG imports from South Korea are also subject to an antidumping duty order. See *Oil Country Tubular Goods from India, the Republic of Korea, the Republic of Turkey, Ukraine, and the Socialist Republic of Vietnam: Continuation of Antidumping and Countervailing Duty Orders*, 85 Fed. Reg. 48665 (Aug. 12, 2020).

<sup>177</sup> CR/PR at I-12. Tenaris asserts that OCTG imports from Mexico "were maintained below levels that would trigger the surge mechanism under the United States-Mexico-Canada Agreement." Tenaris's Prehearing Br. at 50.

Effective April 9, 2022, imports of all products from Russia became subject to the higher duty rates set forth in column 2 of the HTS. Effective July 27, 2022, the column 2 rate of duty was raised to 35.0 percent *ad valorem* for certain articles imported from Russia, including OCTG provided for in certain HTS subheadings.<sup>178</sup> OCTG imported from Russia not provided for in those HTS subheadings is subject to regular column 2 duty rates.<sup>179</sup>

### C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”<sup>180</sup>

Cumulated subject import volume increased by \*\*\* percent from 2019 to 2021, decreasing from \*\*\* short tons in 2019 to \*\*\* short tons in 2020, before increasing to \*\*\* short tons in 2021; cumulated subject import volume was \*\*\* percent greater in interim 2022, at \*\*\* short tons, than in interim 2021, at \*\*\* short tons.<sup>181</sup>

Cumulated subject imports as a share of apparent U.S. consumption increased by \*\*\* percentage points from 2019 to 2021, decreasing from \*\*\* percent in 2019 to \*\*\* percent in 2020, before increasing to \*\*\* percent in 2021; cumulated subject imports as a share of apparent U.S. consumption was \*\*\* percentage points lower in interim 2022, at \*\*\* percent, than in interim 2021, at \*\*\* percent.<sup>182 183 184</sup>

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<sup>178</sup> CR/PR at I-11. These subheadings include: 7304.29.10, 7304.29.20, 7304.29.31, 7304.29.41, 7304.29.50, 7306.29.20, and 7306.29.60. *Id.*

<sup>179</sup> CR/PR at I-11.

<sup>180</sup> 19 U.S.C. § 1677(7)(C)(i).

<sup>181</sup> CR/PR at Tables IV-19 and C-1.

<sup>182</sup> Alternatively, taking into account changes in importers’ inventories, there remains a clear shift in the overall share of volumes away from the domestic industry to subject imports. U.S. producers’ share slightly increased from \*\*\* percent in 2019 to \*\*\* percent in 2020 before declining to \*\*\* percent in 2021 and subject sources’ share steadily increased from \*\*\* percent in 2019 to \*\*\* percent in 2020 to \*\*\* percent in 2021. CR/PR at Table IV-24.

<sup>183</sup> CR/PR at Tables IV-19 and C-1. The ratio of cumulated subject imports to U.S. mill production increased overall by \*\*\* percentage points from 2019 to 2021, decreasing from \*\*\* percent in 2019 to \*\*\* percent in 2020, before increasing to \*\*\* percent in 2021; the ratio of cumulated subject imports to U.S. mill production was lower in interim 2022, at \*\*\* percent, than in interim 2021, at \*\*\* percent. CR/PR at Table IV-3.

<sup>184</sup> The petitions in these investigations were filed in October 2021. Petitioners contend that the filing of the petitions reduced subject import market penetration in interim 2022 relative to interim 2021, and request that the Commission accord reduced weight to post-petition data in these investigations. See Petitioners’ Prehearing Br. at 5 and 9; Answers to Commissioner Questions (Continued...)

Based on the foregoing, we find that the volume of cumulated subject imports, and the increase in that volume, are significant in absolute terms and relative to consumption in the United States.

#### **D. Price Effects of the Subject Imports**

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of the subject imports, the Commission shall consider whether

(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.<sup>185</sup>

As addressed in Section V.B.3, the record indicates that there is a moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports, and that price is an important factor in OCTG purchasing decisions, among other important factors.

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appended to Petitioners' Posthearing Br. at II-35. Tenaris argues that there is no basis for the Commission to accord less weight to post-petition data, noting that, in absolute terms, the volume of cumulated subject imports increased in interim 2022 relative to interim 2021. See Exhibit 1 to Tenaris's Posthearing Br. at 23-31.

Cumulated subject import market share was \*\*\* percentage points lower in interim 2022, after the filing of the petitions, than in interim 2021, before the filing of the petitions, notwithstanding the 70.6 percent increase in apparent U.S. consumption in interim 2022 relative to interim 2021. CR/PR at Tables IV-19 and C-1. These data show a marked decrease in the intensity of subject import competition for market share in the U.S. market compared to the 2020-2021 period, when a 32.2 percent increase in apparent U.S. consumption was accompanied by a \*\*\* percentage point increase in subject import market share. *Id.* We also note that during interim 2022, Commerce issued preliminary affirmative antidumping and critical circumstances determinations regarding Argentina and Mexico, and an affirmative antidumping determination with a negative critical circumstances determination regarding Russia. CR/PR at Tables I-5-7 & Appx. A. Accordingly, we find that the decline in subject import market share in interim 2022 relative to interim 2021 was related to the pendency of the investigations and place less weight on interim 2022 market share data in determining that the volume of subject imports is significant.

<sup>185</sup> 19 U.S.C. § 1677(7)(C)(ii).

The Commission collected quarterly pricing data from U.S. producers and importers for nine pricing products.<sup>186</sup> Eight domestic producers and eight importers provided usable pricing data for sales of the requested products.<sup>187</sup> Pricing data reported by these firms accounted for approximately 25.0 percent of U.S. shipments of OCTG from U.S. producers, \*\*\* percent of U.S. shipments of subject imports from Argentina, \*\*\* percent of U.S. shipments of subject imports from Mexico, \*\*\* percent of subject imports from Russia, and \*\*\* percent of U.S. shipments of subject imports from South Korea in 2021.<sup>188</sup>

Tenaris provides an alternate price comparison methodology, arguing that the Commission should depart from its normal price comparison methodology and “lag by one quarter” its comparisons of subject import prices to domestic prices, comparing domestic prices in a given quarter to subject import prices in the following quarter.<sup>189</sup> Tenaris contends that the Commission should do so because the contract prices for its subject imported OCTG are typically adjusted to align with market prices on a quarterly basis, and thus lag U.S. market prices by a quarter.<sup>190</sup> Consequently, Tenaris asserts, in a time of rising prices, its subject

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<sup>186</sup> CR/PR at V-12-13. The nine pricing products are:

**Product 1.**-- Seamless Casing, Grade L-80, 9 5/8” Outer Diameter, .395-.595” Wall Thickness, Threaded & Coupled, Range 3, sold to end users.

**Product 2.**-- Seamless Casing, Grade L-80, 9 5/8” Outer Diameter, .395-.595” Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

**Product 3.**-- Seamless Casing, Grade K-55, 9 5/8” Outer Diameter, .352-.395” Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

**Product 4.**-- Seamless Casing, Grade K-55, 9 5/8” Outer Diameter, .352-.395” Wall Thickness, Threaded & Coupled, Range 3, sold to end users.

**Product 5.**-- Seamless Casing, Grade P-110, 5 1/2” O.D., 20.0 lbs./ft., Threaded and Coupled, Range 3, sold to end users.

**Product 6.**-- Seamless Casing, Grade P-110, 5 1/2” O.D., 23.0 lbs./ft., Threaded and Coupled, Range 3, sold to end users.

**Product 7.**-- Welded Casing, Grade P-110, 5 ½” Outer Diameter, .304-.415” Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

**Product 8.**-- Welded Casing, Grade J-55, 9 5/8” Outer Diameter, .352-.395” Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

**Product 9.**-- Welded Tubing, Grade-L-80, 2-7/8” outer Diameter, 0.217” Wall Thickness, Range 2, sold to unrelated distributors.

<sup>187</sup> CR/PR at V-13. Not all firms reported pricing for all products for all quarters. *Id.*

<sup>188</sup> CR/PR at V-13.

<sup>189</sup> Tenaris’s Prehearing Br. at 54 and Exhibit 63 (Prusa Analysis). For example, under the lagged approach Tenaris proposes, subject import prices from the fourth quarter of 2021 would be compared to domestic prices from the third quarter of 2021. See Tenaris’s Prehearing Br. at Exhibit 63 (Prusa Analysis).

<sup>190</sup> Tenaris’s Prehearing Br. at 54 and Exhibit 63 (Prusa Analysis). Tenaris has provided examples of contracts with purchasers containing quarterly price adjustment formulas. See Tenaris’s Posthearing Br. at Exhibits 11-13.

imports will “appear” to undersell the domestic like product, “even though the prices established at the time of the contract were at market.”<sup>191</sup>

We are unpersuaded by Tenaris’s argument, and decline to adopt its alternative price comparison methodology, for the following reasons. First, the basis for Tenaris’s proposed adjustments to the Commission’s quarterly price comparisons – that Tenaris’s contracts contain a quarterly pricing lag – would largely be limited to subject imports from Argentina and Mexico; although those accounted for the vast majority of Tenaris’s U.S. shipments of subject imports during the POI, we must consider the significance of underselling by cumulated subject imports.<sup>192</sup>

Second, even as to subject imports from Argentina and Mexico, the percentage of Tenaris’s U.S. shipments subject to contracts containing a time lag is unclear.<sup>193</sup>

Third, Tenaris’s argument assumes that domestic OCTG is generally sold at spot market prices, allegedly creating the appearance of underselling when these market prices rise while subject import contract prices remain unchanged for another quarter, when \*\*\* percent of the domestic industry’s sales were made pursuant to contracts in 2021,<sup>194</sup> some including quarterly pricing mechanisms similar to those in Tenaris’s contracts.<sup>195</sup>

Finally, to the extent that Tenaris’s time lag argument purports to describe cumulated subject imports, it is inconsistent with other record evidence. Under Tenaris’s time lag argument, underselling by cumulated subject imports should have decreased earlier in the period, when spot market prices fell, and significantly increased later in the period, when market prices increased dramatically.<sup>196</sup> Instead, the record shows that the rate of cumulated subject import underselling was fairly consistent from 2019 to 2021, rising only slightly from 55.9 percent of quarterly comparisons in 2019 to 57.1 percent of quarterly comparisons in 2020 and to 60.4 percent of quarterly comparisons in 2021.<sup>197</sup> For all these reasons, we do not view Tenaris’s time lag methodology as a reliable means of analyzing price competition by cumulated subject imports in the U.S. market.

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<sup>191</sup> Tenaris’s Prehearing Br. at 54 and Exhibit 63 (Prusa Analysis); Tenaris’s Final Comments at 7; Tenaris’s Posthearing Br. at Exhibits 11-13.

<sup>192</sup> CR/PR Table III-24; Tenaris Global’s Importer questionnaire response at II-7a and II-8a.

<sup>193</sup> See Tenaris’s Prehearing Br. at Exhibit 63 (Prusa Analysis) (indicating that 25 percent of Tenaris’s sales are not by contract, and stating only that Tenaris’s contracts “*typically*” have quarterly price adjustments) (emphasis added). Additionally, \*\*\*.

<sup>194</sup> CR/PR at Table V-5.

<sup>195</sup> See Petitioners’ Posthearing Br. at 5 and Exhibits 3 and 4 (and the attachments thereto).

<sup>196</sup> Tenaris’s Prehearing Br. at Exhibit 63 (Prusa Analysis).

<sup>197</sup> *Derived from* CR/PR Tables V-6-14.

As noted above, the domestic industry lost 12.0 percentage points of market share from 2020 to 2021, while cumulated subject imports gained \*\*\* percentage points of market share during the same period.<sup>198</sup> The entirety of the domestic industry's market share loss over this period was thus attributable to subject imports.<sup>199</sup>

Overall, the pricing data show that cumulated subject imports undersold the domestic like product in \*\*\* of 170 quarterly comparisons, or \*\*\* percent of the time, at margins ranging between 0.0 and 73.1 percent and averaging 10.8 percent.<sup>200</sup> In contrast, cumulated subject imports oversold the domestic like product in \*\*\* of 170 quarterly comparisons, or \*\*\* percent of the time, at margins ranging between 0.2 and 56.4 percent and averaging 13.1 percent.<sup>201</sup> Quarters in which there was underselling accounted for more than two-thirds, *i.e.*, \*\*\* percent, of the reported volume of cumulated subject import sales (\*\*\* short tons), and quarters in which there was overselling accounted for approximately one-third, *i.e.*, \*\*\* percent, of the reported volume of cumulated subject import sales (\*\*\* short tons).<sup>202</sup> Underselling by cumulated subject imports predominated during each year of the POI and interim 2022.

We also find some evidence that domestic producers lost sales to subject imports on the basis of price. Twenty of 28 responding purchasers reported that they had purchased subject imports instead of the domestic like product during the POI. Eight of those 20 reported that subject imports were priced lower than the domestic like product, and five of those eight reported that price was a primary reason for purchasing of \*\*\* short tons of subject OCTG over

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<sup>198</sup> CR/PR at Tables IV-19 and C-1.

<sup>199</sup> From 2020 to 2021, nonsubject imports lost \*\*\* percentage points of market share. CR/PR at Tables IV-19 and C-1.

<sup>200</sup> CR/PR at Table V-17.

<sup>201</sup> CR/PR at Table V-17.

<sup>202</sup> CR/PR at Table V-17. For seamless OCTG sold to distributors (products 2 and 3), there were \*\*\* instances of underselling (\*\*\* short tons) and \*\*\* instances of overselling (\*\*\* short tons). CR/PR at Table V-35. For seamless OCTG sold to end users (products 1, 4, 5, and 6), there were \*\*\* instances of underselling (\*\*\* short tons) and \*\*\* instances of overselling (\*\*\* short tons). *Id.* For welded OCTG (products 7, 8, and 9), there were \*\*\* instances of underselling (\*\*\* short tons) and \*\*\* instances of overselling (\*\*\* short tons). *Id.*

the domestic like product.<sup>203 204</sup> Consistent with purchasers' reporting, Petitioners provided contemporaneous communications indicating that domestic producers (and their distributors) have lost sales to subject imports on the basis of price.<sup>205</sup>

Given the moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, the importance of price in purchasing decisions, and the predominant underselling by subject imports, both in quarterly comparisons and by volume, we find that subject import underselling was significant during the POI.<sup>206</sup> Underselling by cumulated subject imports led to subject imports gaining \*\*\* percentage points of market share from the domestic industry from 2020 to 2021.<sup>207</sup>

We have also considered price trends during the POI. Prices for all domestically produced pricing products, except product 9, decreased from the first quarter of 2019 to the third or fourth quarter of 2020, and then increased through the second quarter of 2022 to a level higher than in the first quarter of 2019.<sup>208</sup> Prices for domestically produced pricing product 9 decreased from the first quarter of 2019 to the fourth quarter of 2020, and then increased through the third quarter of 2021 (the last quarter for which such data are available),

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<sup>203</sup> CR/PR at Table V-19. Tenaris argues that two of the five purchasers reporting that they purchased subject imports instead of the domestic like product due to price, \*\*\* and \*\*\*, have contradicted this reporting elsewhere in their questionnaire responses. See Tenaris's Prehearing Br. at 55; Tenaris's Posthearing Br. at 10. However, their questionnaire responses generally corroborate their lost sales reporting. See \*\*\* purchaser questionnaire response at III-23 and III-24 (showing that this firm listed price as among its top three purchasing factors, and that it characterized price as very important in its purchasing decisions); and \*\*\* purchaser questionnaire response at III-23 (showing that this firm listed "cost" as a factor that is very important in its purchasing decisions).

<sup>204</sup> Overall, responding purchasers reported that between January 2019 and June 2022, the domestic industry's share of their purchases declined \*\*\* percentage points while the subject import share of their purchases increased \*\*\* percentage points, reflecting a shift in purchases of \*\*\* short tons from the domestic industry to subject imports. CR/PR at Table V-18.

<sup>205</sup> With respect to domestic producers, these communications include, for example: email correspondence from \*\*\*; and email correspondence between \*\*\*. See Petitioners' Posthearing Br. at Attachment E to Exhibit 3; Petitioners' Posthearing Br. at Exhibit 9.

<sup>206</sup> Tenaris emphasizes that, pursuant to its "one price" approach, its subject imports did not undersell its own domestically produced OCTG. See Tenaris's Posthearing Br. at 1. We base our analysis of subject import underselling, however, on the pricing data reported by and comparisons among all responding importers and domestic producers.

<sup>207</sup> We are unpersuaded by Tenaris's arguments that the market share shift is unrelated to subject imports' lower prices, but is rather explained by non-price factors. See *infra*.

<sup>208</sup> CR/PR at Tables V-6-13 and Figures V-3-9. Over the POI, domestic prices increased by: \*\*\* percent for pricing product 1; \*\*\* percent for pricing product 2; \*\*\* percent for pricing product 3; \*\*\* percent for pricing product 4; \*\*\* percent for pricing product 5; \*\*\* percent for pricing product 6; \*\*\* percent for pricing product 7; and \*\*\* percent for pricing product 8. *Id.* at Table V-15.

to a level lower than in the first quarter of 2019.<sup>209</sup> For all pricing products for which first quarter 2019 to second quarter 2022 price comparisons are available, subject import prices increased over the POI.<sup>210</sup> Three of seven responding purchasers reported that U.S. producers had lowered their prices during the POI to compete with lower-priced subject imports, with price reductions ranging from 7 to 35 percent.<sup>211</sup>

We have also considered whether subject imports prevented price increases that otherwise would have occurred to a significant degree. The domestic industry's ratio of COGS-to-net sales increased from 96.8 percent in 2019 to 117.2 percent in 2020, before decreasing to 98.0 percent in 2021, a level 1.2 percentage points greater than in 2019; it was lower in interim 2022, at 77.4 percent, than in interim 2021, at 109.2 percent.<sup>212</sup> The domestic industry's unit COGS increased from \$1,381 in 2019, to \$1,427 in 2020, to \$1,572 in 2021; net sales AUVs declined from \$1,426 in 2019 to \$1,218 in 2020, before increasing to \$1,605 in 2021.<sup>213</sup> Even as apparent U.S. consumption increased 32.2 percent from 2020 to 2021,<sup>214</sup> the domestic

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<sup>209</sup> CR/PR at Table V-14 and Figure V-10. Domestic prices for product 9 decreased by \*\*\* percent from the start of the POI to the third quarter of 2021. *Id.*

<sup>210</sup> CR/PR at Table V-15. For product 1, prices for subject imports from Argentina and Mexico increased by \*\*\* percent and \*\*\* percent, respectively. *Id.* For product 5, prices for subject imports from Argentina and Mexico increased by \*\*\* percent and \*\*\* percent, respectively. *Id.* For product 6, prices for subject imports from Argentina and Mexico increased by \*\*\* percent and \*\*\* percent, respectively. *Id.* For product 8, prices for subject imports from South Korea increased by \*\*\* percent. *Id.* For product 9, prices for subject imports from South Korea increased by \*\*\* percent. *Id.*

<sup>211</sup> CR/PR at Table V-20. Two of the three firms reporting that U.S. producers lowered their prices to compete with lower-priced subject imports during the POI, \*\*\*, are among the largest U.S. purchasers. *Id.* at I-3 and Table V-20.

<sup>212</sup> CR/PR at Tables VI-1-2 and C-1. Between 2019 and 2020, the AUV of the domestic industry's net sales decreased by \$208, while its unit COGS increased by \$46. *Id.* Between 2020 and 2021, the AUV of the domestic industry's net sales increased by \$387, while its unit COGS increased by \$145. *Id.* The AUV of the domestic industry's net sales was \$954 greater in interim 2022 than in interim 2021, and its unit COGS was \$302 greater. *Id.*

The ratio of raw material costs to net sales increased from 2019 to 2021 for both U.S. welded OCTG producers and U.S. seamless OCTG producers. For U.S. welded mills, the ratio of raw material costs to net sales increased from 59.7 percent in 2019 to 64.5 percent in 2020 and to 72.2 percent in 2021; the ratio was higher in interim 2022, at 71.0 percent, than in interim 2021, at 70.0 percent. CR/PR at Table VI-9. For U.S. seamless mills, the ratio of raw material costs to net sales increased from 39.1 percent in 2019 to 46.7 percent in 2020 and to 47.5 percent in 2021; the ratio was lower in interim 2022, at 37.4 percent, than in interim 2021, at 49.4 percent. CR/PR at Table VI-10.

<sup>213</sup> CR/PR at Table C-1. The AUV of the domestic industry's net sales was \$954 greater in interim 2022 than in interim 2021, and its unit COGS was \$302 greater. CR/PR at Table VI-2.

<sup>214</sup> CR/PR at Table IV-19.



industry's COGS-to-net-sales ratio remained elevated, at 98.0 percent.<sup>215</sup> Given the significant underselling and the market share shift, we do not reach a conclusion as to whether the domestic producers would have been able to further increase prices to a significant degree than they did but for subject imports.

Based on the above, we find that cumulated subject imports significantly undersold the domestic like product. The underselling by subject imports led the domestic industry to lose market share to subject imports. We therefore find that cumulated subject imports had significant adverse price effects on the domestic industry.

#### **E. Impact of the Subject Imports<sup>216</sup>**

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."<sup>217</sup> These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to

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<sup>215</sup> Petitioners argue that domestic like product faced pricing pressure from subject imports and that lower-priced subject imports placed a ceiling on domestic industry price increases. Specifically, they provide the following communications: (1) email correspondence from \*\*\*"; (2) internal email correspondence \*\*\* internal \*\*\*, but by its own admission, "TGS USA prices \*\*\*." Tenaris's Prehearing Br. at 15.

<sup>216</sup> The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations of sales at less than fair value Commerce found dumping margins of 78.30 percent for OCTG from Argentina, 44.93 percent for OCTG from Mexico, and 12.84 percent–184.21 percent for OCTG from Russia. *Oil Country Tubular Goods from Argentina: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 87 Fed. Reg. 59054 (Sept. 29, 2022); *Oil Country Tubular Goods from Mexico: Final Affirmative Determinations of Sales at Less Than Fair Value and Critical Circumstances*, 87 Fed. Reg. 59041 (Sept. 29, 2022); and *Oil Country Tubular Goods from the Russian Federation: Final Affirmative Determination of Sales at Less Than Fair Value, and Final Affirmative Critical Circumstances Determination, in Part*, 87 Fed. Reg. 59045 (Sept. 29, 2022). We take into account in our analysis the fact that Commerce has made final findings that all subject producers in Argentina, Mexico, and Russia are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling and price effects of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

<sup>217</sup> 19 U.S.C. § 1677(7)(C)(iii); see also SAA at 851 and 885 ("In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

service debts, research and development (“R&D”), and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>218</sup>

Consistent with the substantial decrease in apparent U.S. consumption from 2019 to 2020 due to the effects of the COVID-19 pandemic, the domestic industry’s performance significantly weakened during that period.<sup>219</sup> As apparent U.S. consumption increased 32.2 percent from 2020 to 2021,<sup>220</sup> however, the domestic industry’s performance showed little if any improvement, as cumulated subject imports captured market share from the industry and prevented it from fully capitalizing on the strong recovery in demand.

Measures of the domestic industry’s output generally declined from 2019 to 2020, increased slightly from 2020 to 2021, and were significantly higher in interim 2022 than in interim 2021. U.S. mills’ capacity decreased overall by 2.4 percent from 2019 to 2021, declining from 6.8 million short tons in 2019 to 6.5 million short tons in 2020, before increasing to 6.6 million short tons in 2021; it was 9.3 percent greater in interim 2022, at 3.6 million short tons, than in interim 2021, at 3.3 million short tons.<sup>221</sup> U.S. mills’ production decreased overall by 39.7 percent from 2019 to 2021, falling from 3.0 million short tons in 2019 to 1.6 million short tons in 2020, before increasing to 1.8 million short tons in 2021; it was 84.4 percent higher in interim 2022, at 1.4 million short tons, than in interim 2021, at 777,294 short tons.<sup>222</sup> U.S. mills’ capacity utilization decreased overall by 17.0 percentage points from 2019 to 2021, declining from 44.6 percent in 2019 to 23.9 percent in 2020, before increasing to 27.6 percent in 2021; it was 16.2 percentage points higher in interim 2022, at 39.7 percent, than in interim 2021, at 23.6 percent.<sup>223</sup>

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<sup>218</sup> 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

<sup>219</sup> Apparent U.S. consumption decreased by 49.6 percent between 2019 and 2020. CR/PR at table IV-19. As previously discussed, both Petitioners and Tenaris attribute declines in demand earlier in the POI to the COVID-19 pandemic.

<sup>220</sup> CR/PR at Table IV-19.

<sup>221</sup> CR/PR at Table III-8. U.S. processors’ capacity was constant from 2019 to 2020, at 2.0 million short tons a year, before declining slightly to 1.97 million short tons in 2021; it was 20.8 percent higher in interim 2022, at 1.2 million short tons, than in interim 2021, at 968,892 short tons. *Id.* at Table III-9.

<sup>222</sup> CR/PR at Table III-8. U.S. processors’ production decreased by 24.2 percent overall from 2019 to 2021, declining from 840,044 short tons in 2019 to 426,793 short tons in 2020, before increasing to 636,826 short tons in 2021; it was 34.9 percent greater in interim 2022, at 448,397 short tons, than in interim 2021, at 332,406 short tons. CR/PR at Table III-9.

<sup>223</sup> CR/PR at Table III-8. U.S. processors’ capacity utilization decreased overall by 9.2 percentage points from 2019 to 2021, declining from 41.4 percent in 2019 to 21.0 percent in 2020, before increasing to 32.2 percent in 2021; it was 4.0 percentage points greater in interim 2022, at 38.3 percent, than in interim 2021, at 34.3 percent. CR/PR at Table III-9.

Consistent with the trend in the domestic industry's production over the POI, the domestic industry's employment indicia generally declined from 2019 to 2020, increased somewhat from 2020 to 2021, and were significantly higher in interim 2022 than in interim 2021.<sup>224</sup> The industry's employment,<sup>225</sup> hours worked,<sup>226</sup> and wages paid<sup>227</sup> all followed this pattern. Productivity for U.S. mills, as measured in short tons per 1,000 hours, increased by 26.1 percent from 2019 to 2021, from 201.2 in 2019 to 211.4 in 2020 and to 253.8 in 2021; it was 15.4 percent higher in interim 2022, at 264.2, than in interim 2021, at 229.0.<sup>228</sup>

U.S. mills' U.S. shipments decreased overall by 43.1 percent from 2019 to 2021, declining from 3.0 million short tons in 2019 to 1.6 million short tons in 2020, and then increasing to 1.7 million short tons in 2021; they were 72.7 percent higher in interim 2022, at 1.2 million short tons, than in interim 2021, at 719,001 short tons.<sup>229</sup> The domestic industry's share of apparent U.S. consumption decreased by 8.2 percentage points from 2019 to 2021, increasing from 56.7 percent in 2019 to 60.4 percent in 2020, before decreasing to 48.4 percent in 2021; its share of apparent U.S. consumption was 0.6 percentage points greater in interim 2022, at 51.2 percent, than in interim 2021, at 50.6 percent.<sup>230</sup>

U.S. mills' end-of-period inventories declined by 42.5 percent from 2019 to 2021, decreasing from 396,431 short tons in 2019 to 176,106 short tons in 2020, before increasing to 228,092 short tons in 2021; they were 79.4 percent higher in interim 2022, at 334,664 short

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<sup>224</sup> For purposes of analyzing the domestic industry's employment indicia other than productivity, we examine the combined employment-related data of both U.S. mills and processors. CR/PR at Table III-32.

<sup>225</sup> Employment fell overall by 44.3 percent from 2019 to 2021, declining from 8,581 production and related workers ("PRWs") in 2019 to 4,728 PRWs in 2020, before increasing to 4,779 PRWs in 2021; it was 48.2 percent greater in interim 2022, at 6,118 PRWs, than in interim 2021, at 4,128 PRWs. CR/PR at Table III-32.

<sup>226</sup> Total hours worked fell overall by 46.6 percent from 2019 to 2021, declining from 21.1 million hours in 2019 to 11.0 million hours in 2020, before increasing to 11.3 million hours in 2021. They were 56.2 greater in interim 2022, at 8.3 million hours, than in interim 2021, at 5.3 million hours. CR/PR at Table III-32.

<sup>227</sup> Wages paid fell overall by 41.6 percent from 2019 to 2021, declining from \$646.8 million in 2019 to \$347.7 million in 2020, before increasing to \$378.0 million in 2021. They were 67.7 percent greater in interim 2022, at \$276.8 million, than in interim 2021, at \$165.1 million. CR/PR at Table III-32.

<sup>228</sup> CR/PR at Table III-26. The productivity of U.S. processors, as measured in short tons per 1,000 hours, was 137.3 in 2019, 116.8 in 2020, and 155.5 in 2021; it was lower in interim 2022, at 156.6, than in interim 2021, at 173.9. *Id.* at Table III-27.

<sup>229</sup> CR/PR at Table III-13. U.S. non-toll processors' U.S. shipments decreased from \*\*\* short tons in 2019 to \*\*\* short tons in 2020 and to \*\*\* short tons in 2021; they were lower in interim 2022, at \*\*\* short tons, than in interim 2021, at \*\*\* short tons. *Id.* at Table III-14.

<sup>230</sup> CR/PR at Table IV-19.

tons, than in interim 2021, at 192,099 short tons.<sup>231</sup> As a ratio of total shipments, U.S. mills' end-of-period inventories declined from \*\*\* percent in 2019 to \*\*\* percent in 2020, before increasing to \*\*\* percent in 2021, and were higher in interim 2022, at \*\*\* percent, than in interim 2021, at \*\*\* percent.<sup>232</sup>

The domestic industry's financial performance declined from 2019 to 2020, improved somewhat from 2020 to 2021, and improved significantly in interim 2022 relative to interim 2021.<sup>233</sup> The industry's total net sales revenues declined from \$4.6 billion in 2019 to \$2.2 billion in 2020, before increasing to \$2.9 billion in 2021, a level 36.7 percent lower than in 2019, and were 187.3 percent higher in interim 2022, at \$3.1 billion, than in interim 2021, at \$1.1 billion.<sup>234</sup> The domestic industry's operating losses increased from \$221.9 million in 2019 to \$659.3 million in 2020, before decreasing to \$254.9 million in 2021; it had an operating income of \$508.3 million in interim 2022, compared to an operating loss of \$236.3 million in interim 2021.<sup>235</sup> The industry's ratio of operating income to net sales worsened from negative 4.8 percent in 2019 to negative 30.6 percent in 2020, before improving to negative 8.8 percent in 2021.<sup>236</sup> Its ratio of operating income to net sales was 16.4 percent in interim 2022, compared to negative 21.9 percent in interim 2021.<sup>237</sup> The domestic industry's return on assets declined from negative \*\*\* percent in 2019 to negative \*\*\* percent in 2020, before increasing to negative \*\*\* percent in 2021.<sup>238</sup> The industry's capital expenditures declined overall by 62.5

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<sup>231</sup> CR/PR at Table III-17. U.S. non-toll processors' inventories decreased from \*\*\* short tons in 2019 to \*\*\* short tons in 2020 and to \*\*\* short tons in 2021; they were higher in interim 2022, at \*\*\* short tons, than in interim 2021, at \*\*\* short tons. *Id.* at Table III-18.

<sup>232</sup> CR/PR at Table III-17. Non-toll processors' end-of-period inventories decreased as a ratio of total shipments from \*\*\* percent in 2019 to \*\*\* percent in 2020, before increasing to \*\*\* percent in 2021, and were higher in interim 2022, at \*\*\* percent, than in interim 2021, at \*\*\* percent. *Id.* at Table III-18.

<sup>233</sup> For purposes of analyzing the financial results of the domestic industry, we examine the combined operations of both U.S. mills and non-toll processors. CR/PR at Table VI-1.

<sup>234</sup> CR/PR at Table VI-1.

<sup>235</sup> CR/PR at Table VI-1. Gross profit decreased from \$146.6 million in 2019 to negative \$370.0 million in 2020, before increasing to positive \$59.2 million in 2021; the industry had a gross profit of \$700.2 million in interim 2022, compared to a gross loss of \$99.6 million in interim 2021. *Id.* Net income worsened from \*\*\* in 2019 to \*\*\* in 2020, before improving to a \*\*\* in 2021; the industry had a net income of \$\*\*\* in interim 2022, compared to \*\*\* in interim 2021. *Id.* The domestic industry's ratio of net income to net sales decreased from \*\*\* percent in 2019 to \*\*\* percent in 2020, before increasing to \*\*\* percent in 2021; it was higher in interim 2022, at \*\*\* percent, than in interim 2021, at \*\*\* percent. *Id.*

<sup>236</sup> CR/PR at Table VI-1.

<sup>237</sup> CR/PR at Table VI-1.

<sup>238</sup> CR/PR at Table VI-21.

percent from 2019 to 2021,<sup>239</sup> and were 19.8 percent higher in interim 2021 than in interim 2020.<sup>240</sup> Its R&D expenses declined by \*\*\* percent between 2019 and 2021, and were \*\*\* percent lower in interim 2022 than in interim 2021.<sup>241</sup> The domestic industry also reported negative effects on investment, growth, and development due to subject imports.<sup>242</sup>

We find a causal nexus between cumulated subject imports and the domestic industry's weak performance relative to the strong growth in apparent U.S. consumption from 2020 to 2021. Subject import volume increased significantly in absolute terms and relative to apparent U.S. consumption from 2020 to 2021, driven by significant subject import underselling, capturing 12.0 percentage points of market share from the domestic industry during the period. Consequently, despite the 32.2 percent increase in apparent U.S. consumption from 2020 to 2021, the industry's production, employment, and financial performance remained weaker in 2021 than would have been expected in light of the strong increase in demand.<sup>243</sup>

We find it instructive that the domestic industry was able to improve its performance markedly in interim 2022 compared to interim 2021 after the filing of the petitions in October 2021. As discussed above, subject imports competed less aggressively in the U.S. market after the filing of the petitions, losing \*\*\* percentage points of market share as the domestic industry gained 0.6 percentage points of market share in interim 2022 compared to interim 2021.<sup>244</sup> Consequently, the domestic industry was able to more fully capitalize on the 70.6 percent increase in apparent U.S. consumption in interim 2022 compared to interim 2021 and improved its performance by nearly every measure between the interim periods.<sup>245</sup>

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<sup>239</sup> CR/PR at Tables VI-16 and C-1. Its capital expenditures decreased from \$178.0 million in 2019 to \$72.9 million in 2020 and to \$66.8 million in 2021. *Id.*

<sup>240</sup> CR/PR at Tables VI-16 and C-1. Its capital expenditures were \$36.6 million in interim 2022, compared to \$30.5 million in interim 2021. *Id.*

<sup>241</sup> CR/PR at Tables VI-18 and C-1. Its R&D expenses decreased from \$\*\*\* in 2019 to \$\*\*\* in 2020 and to \$\*\*\* in 2021; they were \$\*\*\* in interim 2022 compared to \$\*\*\* in interim 2021. *Id.*

<sup>242</sup> CR/PR at Tables VI-23-24.

<sup>243</sup> Notably, in certain respects, the industry's performance in 2021 remained similar to its performance in 2020, when the industry was experiencing a demand collapse due to the COVID-19 pandemic. For example, U.S. mills' capacity and capacity utilization were only 1.3 percent and 3.7 percentage points greater, respectively, in 2021 than in 2020, and U.S. producers' employment and hours worked were only 1.1 percent and 2.2 percent greater, respectively, in 2021 than in 2020. CR/PR at Table C-1. Moreover, the industry's capital expenditures and R&D expenses were each lower in 2021 than in 2020. *Id.*

<sup>244</sup> CR/PR at Table IV-19.

<sup>245</sup> Commissioner Schmidlein does not join this paragraph. While she agrees that the filing of the petitions and the pendency of the investigations had an effect on the data (and thus she accords less weight to the interim data), she does not find the effect on the data to be evidence of present material injury.

We have also considered whether there are other factors that may have had an adverse impact on the domestic industry during the POI to ensure that we are not attributing injury from such other factors to subject imports. Nonsubject imports do not explain the injury we have attributed to subject imports. Nonsubject imports lost \*\*\* percentage points of market share from 2020 to 2021, as subject imports captured 12.0 percentage points of market share from the domestic industry.<sup>246</sup> Furthermore, the AUVs of nonsubject welded and seamless OCTG imports were higher than the AUVs of subject welded and seamless OCTG imports in 2021, when the domestic industry's performance was weaker than would have been expected.<sup>247</sup> Additionally, when nonsubject imports significantly increased in both absolute terms and relative to apparent U.S. consumption in interim 2022 relative to interim 2021, gaining \*\*\* percentage points of market share, the domestic industry's performance substantially improved.<sup>248</sup>

We are unpersuaded by Tenaris's argument that any injury to the domestic industry is explained by the industry's supply constraints and not subject imports.<sup>249</sup> The record does not indicate that the domestic industry's supply constraints drew subject imports into the U.S. market such that these constraints could account for the industry's market share loss and consequent injury. Although both the domestic industry and subject imports experienced supply constraints, as discussed in section V.B above, large majorities of purchasers rated the availability of domestically produced OCTG as superior or comparable to that of subject imports from each source.<sup>250</sup> Further, the domestic industry reported substantial unused capacity throughout the POI, including a capacity utilization rate of 27.6 percent and excess capacity of 4.8 million short tons in 2021, when the market share loss occurred.<sup>251</sup> Additionally undermining Tenaris's argument that domestic industry supply constraints necessitated increased subject imports in 2021, cumulated subject import underselling remained nearly as

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<sup>246</sup> CR/PR at Table IV-19.

<sup>247</sup> CR/PR at Tables IV-5-6. We recognize that AUV comparisons may reflect differences in product mix or changes in product mix over time.

<sup>248</sup> CR/PR at Table C-1.

<sup>249</sup> Tenaris's Prehearing Br. at 4-5.

<sup>250</sup> CR/PR at Table II-14. Large majorities of purchasers also rated the reliability of supply of domestically produced OCTG as superior or comparable to that of subject imports from each source. *Id.*

<sup>251</sup> CR/PR at Tables III-7-8. Even adjusting for U.S. Steel's idling of a welded mill (790,000 short tons) and a seamless mill (380,000 short tons) throughout 2021, and for \*\*\* keeping the \*\*\* of welded capacity it had acquired from \*\*\* offline in 2021, the industry's capacity utilization rate would still be \*\*\* percent, and its excess capacity \*\*\* short tons, in 2021. *See Id.* at III-12, n.6 and Table III-8; \*\*\* questionnaire response at II-2a, II-3a, and II-3c.

predominant in 2021 as in 2020,<sup>252</sup> whereas subject imports drawn into the U.S. market by short supplies of domestic OCTG would be expected to command higher prices.

We are also unpersuaded by Tenaris's argument that the market share shift was caused as distributors drew down their "inventory overhang{s}" in lieu of placing orders with domestic mills during the POI, thus delaying the "re-activation of domestic OCTG production."<sup>253</sup> As an initial matter, we note that even Tenaris's preferred inventory data, derived from \*\*\*, show that any alleged inventory "bulge" was largely worked down by the end of 2020, prior to the domestic industry's loss of market share to subject imports in 2021.<sup>254</sup> Thus, any such inventory overhang would not explain why the 32.2 percent increase in apparent consumption from 2020 to 2021, unmet by existing inventories, was satisfied by increased subject imports rather than domestic producers. Second, inventory data from \*\*\*, which includes inventory of OCTG held by end users and distributors, indicates that monthly inventory levels of OCTG – which include sourcing from both domestic producers and importers – were relatively constant between January 2019 and March 2021, with small fluctuations above and below a level of about \*\*\* net tons.<sup>255</sup> Thus, these data suggest no "massive" draw down of inventories in 2020, as Tenaris describes.<sup>256</sup> As demand increased in 2021, these inventories grew steadily, consistent with the market, for the rest of 2021 and interim 2022. Finally, to the extent that inventory overhangs were causing supply constraints, this issue would affect domestic OCTG and imports alike, including subject imports. However, the record indicates otherwise. Inventories may have had some effect on delaying domestic producers' resumption of production and shipments, which only grew 16.9 percent and 6.0 percent, respectively, in 2021, and on nonsubject import volume, which only grew 21.7 percent in 2021.<sup>257</sup> However, at the same time, cumulated subject import volume grew by 135.6 percent, with significant increases in volume from all subject countries which suggests that inventories, or inventories alone, cannot explain why additional demand in 2021 was satisfied by increased subject imports,

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<sup>252</sup> *Derived* from CR/PR at Tables V-6-14.

<sup>253</sup> Petitioner's Prehearing Br. at 27.

<sup>254</sup> *See* Tenaris's Prehearing Br. at 28. This is also supported by industry witnesses at the hearing, who indicated that inventory levels were normalized by the fourth quarter of 2020. *See* Tr. at 61 (Mendenhall) and 98 (Tait).

<sup>255</sup> *See* CR/PR at II-16 and Table II-4. We note that the inventory data submitted by Tenaris from \*\*\*, like the data from \*\*\*, do not distinguish where in the supply chain the inventories are held. *See* Tenaris's Prehearing Br. Exh. 42 at \*\*\*. Thus, the record does not establish whether inventory increases necessarily affected domestic producers' customers more than they affected Tenaris and its customers.

<sup>256</sup> We note that there was a reduction in "operational consumption," a measure of tonnage of OCTG used, which reached a low point in August 2020 as a result of the COVID-19 pandemic. *See* CR/PR at II-22 and Table II-6.

<sup>257</sup> CR/PR at Table C-1.

rather than domestic producers and nonsubject imports.<sup>258</sup> As we found above, the industry's weak production, employment, and financial performance and inability to capitalize on the increase in apparent consumption was driven by significant subject import underselling and the cumulated subject import volume.

Similarly, we are not persuaded by Tenaris's argument that the shift in market share toward cumulated subject imports was caused by superior availability and technical assistance resulting from Tenaris's Rig Direct program.<sup>259</sup> Contrary to Tenaris's argument, large majorities of purchasers rated domestically produced OCTG as superior or comparable to subject imports with respect to both availability and technical support/service.<sup>260</sup> Moreover, Petitioners have submitted signed declarations and supporting documentation corroborating that domestic producers in combination with their distributors provide the same services as Rig Direct.<sup>261</sup> Finally, we note that the domestic industry not only lost market share to subject imports from Argentina and Mexico, primarily imported by Tenaris, but also to subject imports from Russia and South Korea that were not sold via Rig Direct.<sup>262</sup>

Tenaris has also argued that rising domestic HRC prices and labor shortages constrained domestic supply and necessitated increased subject imports in 2021.<sup>263</sup> Yet, even if increasing HRC prices helped reduce domestic production of welded OCTG, domestic producers of seamless OCTG, which utilize steel billets as their raw material input, were unaffected by changes in HRC prices. Domestic producers of seamless OCTG were fully capable of serving the increase in OCTG demand from 2020 to 2021 in light of their low rate of capacity utilization, \*\*\* percent in 2021, and the interchangeability of seamless OCTG for welded OCTG.<sup>264</sup> Contrary to Tenaris's argument that labor shortages significantly constrained domestic production, responding domestic producers and domestic industry witnesses at the hearing indicated that they were capable of hiring as warranted by increased demand for domestic OCTG, and the

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<sup>258</sup> CR/PR at Table C-1. Tenaris argues that their Rig Direct program allows them to run with a lean inventory volume and therefore the inventory overhang did not impact them in the same way as other domestic producers. Answers to Commissioner Questions appended to Tenaris's Posthearing Brief at 57-59. However, any inventory overhang held by distributors would have included subject imports from Russia and South Korea and impacted them in the same manner as domestic producers.

<sup>259</sup> See Tenaris's Prehearing Br. 55; Tenaris Posthearing Br. at 11.

<sup>260</sup> CR/PR at Table II-14.

<sup>261</sup> See Petitioners' Posthearing Br. at Exhibits 3 and 4 (and attachments thereto).

<sup>262</sup> See CR/PR at Table IV-19.

<sup>263</sup> Tenaris's Prehearing Br. at 24-27.

<sup>264</sup> CR/PR at Tables III-7-8.



domestic industry sharply expanded employment in interim 2022, after the filing of the petitions caused subject imports to compete less aggressively in the U.S. market.<sup>265</sup>

Finally, we are unpersuaded by Tenaris's argument that intra-industry competition explains any injury to the domestic industry.<sup>266</sup> Intra-industry competition cannot explain the domestic industry's loss of market share to subject imports from 2020 to 2021.

In sum, based on the record in the final phase of these investigations, we conclude that cumulated subject imports had a significant impact on the domestic industry.

## VI. Critical Circumstances

### A. Legal Standards

In its final antidumping duty determinations concerning OCTG from Mexico and Russia, Commerce found that critical circumstances exist with respect to imports of OCTG from Mexico produced and exported by all Mexican producers and exporters, and with respect to imports of OCTG from Russia produced and exported by Volzhsky Pipe Plant, Joint Stock Company and the TMK Group, but not by other Russian producers and exporters.<sup>267</sup> Because we have determined that the domestic industry is materially injured by reason of subject imports from Mexico and Russia, we must further determine "whether the imports subject to the affirmative {Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued."<sup>268</sup>

The SAA indicates that the Commission is to determine "whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order" and specifically "whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order."<sup>269</sup> The legislative history for the critical circumstances provision indicates that the provision was designed "to deter exporters whose

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<sup>265</sup> CR/PR at II-13 ("U.S. producer \*\*\* reported adding additional labor as demand increased") and Table III-5 (\*\*\*); Tr. at 67 (Beltz) ("{w}e had the people. We had the availability"); *Id.* at 68 (Dorn) ("we started up our electric arc furnace in October of 2020, and we hired 150 people during that time frame . . . and we also hired employees throughout our production facilities through this timeframe").

<sup>266</sup> Tenaris's Prehearing Br. at 61; Tenaris's Posthearing Br. at 2.

<sup>267</sup> *Oil Country Tubular Goods from Mexico: Final Affirmative Determinations of Sales at Less Than Fair Value and Critical Circumstances*, 87 Fed. Reg. 59041 (Sept. 29, 2022); *Oil Country Tubular Goods from the Russian Federation: Final Affirmative Determination of Sales at Less Than Fair Value, and Final Affirmative Critical Circumstances Determination, in Part*, 87 Fed. Reg. 59045 (Sept. 29, 2022).

<sup>268</sup> 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

<sup>269</sup> SAA at 877.

merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}."<sup>270</sup> An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period 90 days prior to the suspension of liquidation.

The statute provides that, in making this determination, the Commission shall consider, among other factors it considers relevant,

- (I) the timing and the volume of the imports,
- (II) a rapid increase in inventories of the imports, and
- (III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.<sup>271</sup>

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petitions with those subsequent to the filing of the petitions using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.<sup>272</sup>

## **B. Party Arguments**

Petitioners argue that the Commission must make an affirmative critical circumstances determination with respect to Mexico if it is to provide an effective remedy. They contend that imports of Mexican OCTG increased 17.8 percent in the post-petition period (October 2021– March 2022) compared to the pre-petition period (April 2021– September 2021). Petitioners also maintain that, despite increasing apparent U.S. consumption, inventories of Mexican OCTG increased by \*\*\* percent in the “immediate aftermath after the petition.”<sup>273</sup> They submit that

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<sup>270</sup> *ICC Industries, Inc. v United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. Rep. No. 96-317 at 63 (1979), *aff'g* 632 F. Supp. 36 (Ct. Int'l Trade 1986). See 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

<sup>271</sup> 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

<sup>272</sup> See *Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-443, 731-TA-1095-1097, USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-1061 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

<sup>273</sup> Petitioners' Prehearing Br. at 56.

this is the “type of pernicious behavior that the critical circumstances provision is intended to address.”<sup>274</sup>

Tenaris argues that critical circumstances do not exist for subject imports from Mexico. It contends that the \*\*\* in the imports and inventories of OCTG from Mexico took place as consumption increased, and argues that “an increase in consumption is exactly the context in which the Commission has found that (even significant) increases in imports and inventories will not greatly or insidiously weaken an order, precisely because such increases respond to market growth.”<sup>275</sup> TMK argues that critical circumstances do not exist for subject imports from Russia.<sup>276</sup>

### C. Analysis

We first consider the appropriate period for comparison of pre-petition and post-petition levels of subject imports from Mexico and Russia. The petitions in these investigations were filed on October 6, 2021.<sup>277</sup> In previous investigations, the Commission has relied on a shorter comparison period when Commerce’s preliminary determination applicable to the subject imports at issue fell within the six-month post-petition period the Commission typically considers.<sup>278</sup> That situation does not arise here with respect to subject imports from Mexico, as Commerce’s preliminary determination was issued on May 11, 2022,<sup>279</sup> after the last month in the six-month post-petition period of October 2021 through March 2022. We therefore compare the volume of subject imports in the six months prior to the filing of the petitions (April 2021-September 2021) with the volume of subject imports in the six months after the filing of the petitions (October 2021-March 2022) for purposes of our critical circumstances analysis with respect to subject imports from Mexico subject to Commerce’s affirmative critical circumstances finding.

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<sup>274</sup> Petitioners’ Prehearing Br. at 56.

<sup>275</sup> Tenaris’s Posthearing Br. at 15 (citing *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, France, Germany, Italy, Japan, Korea, and Taiwan*, Inv. Nos. 701-TA-561 and 731-TA-1317-1318, 1321-1325, and 1327, USITC Pub. 4691 (May 2017) at 7-9).

<sup>276</sup> TMK’s Final Comments at 4-7.

<sup>277</sup> CR at I-1.

<sup>278</sup> *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547, 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sept. 2016); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. No. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4630 at 35-40 (July 2016); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination was during the sixth month after the petition).

<sup>279</sup> See CR/PR at Table I-1.

That situation does arise here, however, with respect to subject imports from Russia, as Commerce’s preliminary countervailing duty determination was issued on March 14, 2022,<sup>280</sup> before the end of the last month of the applicable six-month post-petition period of October 2021 through March 2022. We have thus determined to compare the volume of subject imports in the five months prior to the filing of the petitions (May 2021-September 2021) with the volume of subject imports in the five months after the filing of the petitions (October 2021-February 2022) for purposes of our critical circumstances analysis with respect to subject imports from Russia subject to Commerce’s affirmative critical circumstances finding.

## 1. Mexico Investigation

Subject imports from Mexico subject to Commerce’s affirmative critical circumstances determination increased from 170,211 short tons in the pre-petition period to 200,527 short tons in the post-petition period, an increase of 17.8 percent, comprising just over one percent of apparent U.S. consumption in interim 2022.<sup>281</sup> End-of-period inventories of subject merchandise from Mexico held by U.S. importers increased from \*\*\* short tons on September 30, 2021 to \*\*\* short tons on March 30, 2022, an increase of \*\*\* percent.<sup>282</sup>

While we recognize that both the import volume and the inventory level increased in the post-petition period, we observe that this post-petition period corresponds closely with the interim 2022 period, during which time apparent U.S. consumption increased by 70.6 percent relative to the interim 2021 period, which corresponds closely with the pre-petition period.<sup>283</sup> This suggests that some portion of the increase in imports and inventories from Mexico in the post-petition period relative to the pre-petition period is related to overall changes in market conditions between these periods. Moreover, we note the increase in import volume from Mexico in the post-petition period continued the upward pre-petition trend that began in August 2021,<sup>284</sup> which does not indicate a “rush” by Mexican producers to export substantial volumes of product to the U.S. market at lower prices before a deposit requirement takes effect. Indeed, the market share of shipments of imports from Mexico was \*\*\* percent in interim 2022, lower than it was in interim 2021 (\*\*\* percent) and well within its range during the full years of the POI (\*\*\* percent to \*\*\* percent).<sup>285</sup> In light of these considerations, we do

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<sup>280</sup> See CR/PR at Table I-1.

<sup>281</sup> CR/PR at Tables IV-9 and C-1. We recognize that the interim 2022 period does not perfectly align with the post-petition period of October 2021 to March 2022.

<sup>282</sup> CR/PR at Table IV-10.

<sup>283</sup> CR/PR at Table IV-19.

<sup>284</sup> CR/PR at Figure IV-4.

<sup>285</sup> CR/PR at Table C-1.

not find that subject imports from Mexico are likely to undermine seriously the remedial effect of the antidumping duty order. Consequently, we determine that critical circumstances do not exist with respect to subject imports from Mexico.

## 2. Russia Investigation

Subject imports from Russia subject to Commerce's affirmative critical circumstances determination decreased from \*\*\* short tons in the pre-petition period to \*\*\* short tons in the post-petition period, a decrease of \*\*\* percent.<sup>286</sup> End-of-period inventories of subject merchandise from Russia held by U.S. importers decreased from \*\*\* short tons on September 30, 2021 to \*\*\* short tons on December 31, 2021, a decrease of \*\*\* percent.<sup>287</sup> As both the import volume and the inventory level decreased in the post-petition period, we do not find that subject imports from Russia subject to Commerce's affirmative critical circumstances finding are likely to undermine seriously the remedial effect of the antidumping duty order. Consequently, we determine that critical circumstances do not exist with respect to subject imports from Russia.<sup>288</sup>

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<sup>286</sup> CR/PR at Table IV-11.

<sup>287</sup> CR/PR at Table IV-12. These inventories all originated from \*\*\*, a foreign producer/exporter subject to Commerce's final affirmative critical circumstances finding. *Id.*

<sup>288</sup> Commissioner Kearns and Commissioner Karpel concur that the record in these investigations does not support a finding that the subject imports from Mexico and Russia would undermine seriously the remedial effects of the order. Commissioner Kearns and Commissioner Karpel observe that the statute directs the Commission to consider the following factors in making this determination: "the timing and volume the imports, a rapid increase in the inventories of the imports, and any other circumstances indicating that the remedial effect of the antidumping order will be seriously undermined." 19 U.S.C. §1673d(b)(4)(A)(ii). In their analysis, they would therefore take into account a number of factors as appropriate to a given investigation (as directed by the statute) and do not necessarily give precedence to the pre- and post-petition subject import volumes. Among the factors they may consider, depending on the facts of the investigation and the available data, are the parties' arguments, subject import volumes relative to apparent U.S. consumption or production, monthly changes in subject import volume, subject import inventories (both absolute and relative to imports or shipments of imports), purchaser inventories, pricing, and the domestic industry's performance.

## **VII. Conclusion**

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of OCTG from Argentina, Mexico, and Russia that are sold in the United States at less than fair value and imports of the subject merchandise from Russia and South Korea that are subsidized by the governments of Russia and South Korea. We also find that critical circumstances do not exist with respect to imports of OCTG from Mexico and Russia that are subject to Commerce's final affirmative critical circumstances determinations.

# Part I: Introduction

## Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by Borusan Mannesmann Pipe U.S., Inc. (“Borusan”), Baytown, Texas; PTC Liberty Tubulars LLC (“PTC Tubular”), Liberty, Texas; U.S. Steel Tubular Products, Inc. (“U.S. Steel”), Pittsburgh, Pennsylvania; Welded Tube USA, Inc. (“Welded Tube USA”), Lackawanna, New York; and the United States Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC, Pittsburgh, Pennsylvania, on October 6, 2021, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of oil country tubular goods (“OCTG”)<sup>1</sup> from Russia and South Korea and less-than-fair-value (“LTFV”) imports of OCTG from Argentina, Mexico, and Russia. Table I-1 presents information relating to the background of these investigations.<sup>2 3</sup>

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<sup>1</sup> See the section entitled “The subject merchandise” in Part I of this report for a complete description of the merchandise subject in this proceeding.

<sup>2</sup> Pertinent Federal Register notices are referenced in appendix A, and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>3</sup> Appendix B presents the witnesses that appeared the Commission’s hearing.

**Table I-1**

**OCTG: Information relating to the background and schedule of this proceeding**

| <b>Effective date</b> | <b>Action</b>  |
|-----------------------|--|
| October 6, 2021       | Petitions filed with Commerce and the Commission; institution of Commission investigations (86 FR 56983, October 13, 2021)   |
| October 26, 2021      | Commerce's notice of initiation (86 FR 60205 and 86 FR 60210, November 1, 2021)  |
| November 22, 2021     | Commission's preliminary determinations (86 FR 67491, November 26, 2021)   |
| March 14, 2022        | Commerce's preliminary CVD determinations (87 FR 14248 and 14249, March 14, 2022)  |
| May 11, 2022          | Commerce's preliminary AD determinations (87 FR 28801, 87 FR 28804, and 28808, May 11, 2022); scheduling of final phase of Commission investigations (87 FR 35246, June 9, 2022) |
| September 22, 2022    | Commission's hearing   |
| September 29, 2022    | Commerce's final CVD determinations (87 FR and 59047 and 59056, September 29, 2022)  |
| September 29, 2022    | Commerce's final AD determinations (87 FR 59041, 59045, and 59054, September 29, 2022)   |
| October 26, 2022      | Commission's vote  |
| November 14, 2022     | Commission's views   |

## **Statutory criteria**

Section 771(7)(B) of the Tariff Act of 1930 (the "Act") (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission--

*shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.*

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--<sup>4</sup>

*In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant. . . .In evaluating the*

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<sup>4</sup> Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.



*effect of imports of such merchandise on prices, the Commission shall consider whether. . . (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree. . . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.*

*In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—<sup>5</sup>*

*(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.*

## **Organization of report**

Part I of this report presents information on the subject merchandise, subsidy/dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use

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<sup>5</sup> Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

in the Commission’s consideration of the question of threat of material injury as well as information regarding nonsubject countries.

## Market summary

OCTG consists primarily of casing and tubing and is generally used in oil and natural gas wells.<sup>6</sup> U.S. producers of OCTG include mills and processors; the leading U.S. mills are Tenaris USA (Tenaris Bay City, Maverick Tube Corporation, IPSCO Tubulars Inc.) (“Tenaris USA”); U.S. Steel; and Vallourec STAR, L.P. (“Vallourec”) and the leading U.S. processors are Texas Steel Conversion, Inc. (“Texas Steel Conversion”) and Tubular Services LLC (“Tubular Services”). The leading responding subject producers of OCTG include Siderca S.A.I.C. (“Siderca”) of Argentina, Tubos de Acero de Mexico S.A. (“TAMSA”) of Mexico, TMK Group of Russia, and SeAH Steel Corporation (“SeAH Steel”) of South Korea. The leading U.S. importer of OCTG from Argentina and Mexico is \*\*\*, while the leading U.S. importer of OCTG from Russia is \*\*\* and the leading U.S. importer of subject OCTG from South Korea is \*\*\*. Leading importers of nonsubject OCTG (primarily from Austria, Canada, and Taiwan, \*\*\*) include \*\*\*. U.S. purchasers of OCTG are firms that drill for oil and gas, as well as firms that distribute to such oil and gas explorers and producers. Leading purchasers include distributors such as \*\*\* and end users such as \*\*\*.

Apparent U.S. consumption of OCTG totaled approximately 3.5 million short tons (\$5.1 billion) in 2021. U.S. producers’ U.S. shipments of OCTG totaled 1.7 million short tons (\$2.9 billion) in 2021, and accounted for 48.4 percent of apparent U.S. consumption by quantity and 56.4 percent by value. U.S. imports of OCTG from subject sources totaled \*\*\* short tons (\$\*\*\*) in 2021 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. imports from nonsubject sources totaled \*\*\* short tons (\$\*\*\*) in 2021 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value.

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<sup>6</sup> Petition, pp. 13 and 21.

## Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1 (total U.S. market), and table C-2 (U.S. market excluding \*\*\*).<sup>7</sup> Except as noted, U.S. industry data are based on questionnaire responses of 19 firms that staff believes accounted for the large majority of U.S. OCTG production during 2021. U.S. imports are based on official Commerce import statistics, with adjustments made by Commission staff \*\*\*.

## Previous and related investigations

OCTG has been the subject of several prior countervailing and antidumping duty investigations in the United States. Table I-2 presents data on those proceedings.

**Table I-2**  
**OCTG: Previous and related Commission proceedings and status of orders**

| Date | Number     | Country     | Determination                            | Current Status of Order        |
|------|------------|-------------|--|--------------------------------|
| 1984 | 701-TA-215 | Brazil      | Affirmative                              | Order revoked, August 21, 1985 |
| 1984 | 701-TA-216 | South Korea | Negative                                 | ---                            |
| 1984 | 701-TA-217 | Spain       | Affirmative                              | Order revoked, July 31, 1985   |
| 1984 | 731-TA-191 | Argentina   | Negative                                 | ---                            |
| 1984 | 731-TA-192 | Brazil      | Petition withdrawn                       | ---                            |
| 1984 | 731-TA-193 | South Korea | Petition withdrawn                       | ---                            |
| 1984 | 731-TA-194 | Mexico      | Petition withdrawn                       | ---                            |
| 1984 | 731-TA-195 | Spain       | Affirmative                              | Order revoked, June 30, 1985   |
| 1985 | 701-TA-240 | Austria     | Petition withdrawn                       | ---                            |
| 1985 | 701-TA-241 | Venezuela   | Petition withdrawn                       | ---                            |
| 1985 | 701-TA-255 | Canada      | Affirmative                              | Order revoked, July 10, 1991   |
| 1985 | 701-TA-256 | Taiwan      | Negative final determination by Commerce | ---                            |
| 1985 | 731-TA-249 | Austria     | Petition withdrawn                       | ---                            |
| 1985 | 731-TA-250 | Romania     | Petition withdrawn                       | ---                            |
| 1985 | 731-TA-251 | Venezuela   | Petition withdrawn                       | ---                            |
| 1985 | 731-TA-275 | Argentina   | Negative final determination by Commerce | ---                            |

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<sup>7</sup> In its preliminary views, the Commission determined that appropriate circumstances did not exist to exclude \*\*\* from the domestic industry, although it noted that the question was a close one.

| <b>Date</b> | <b>Number</b> | <b>Country</b> | <b>Determination</b>                 | <b>Current Status of Order</b>                        |
|-------------|---------------|----------------|--------------------------------------|---|
| 1985        | 731-TA-276    | Canada         | Affirmative                          | Order revoked, August 22, 2000                        |
| 1985        | 731-TA-277    | Taiwan         | Affirmative                          | Order revoked, August 22, 2000                        |
| 1986        | 701-TA-271    | Israel         | Affirmative                          | Order revoked, March 1, 1993                          |
| 1986        | 731-TA-318    | Israel         | Affirmative                          | Order revoked, July 27, 1999                          |
| 1995        | 701-TA-363    | Austria        | Negative                             | ---   |
| 1995        | 701-TA-364    | Italy          | Affirmative                          | Order revoked, December 26, 2006                      |
| 1995        | 731-TA-711    | Argentina      | Affirmative                          | Order revoked, June 22, 2007                          |
| 1995        | 731-TA-712    | Austria        | Negative                             | ---   |
| 1995        | 731-TA-713    | Italy          | Affirmative                          | Order revoked, June 22, 2007                          |
| 1995        | 731-TA-714    | Japan          | Affirmative                          | Order revoked, June 22, 2007                          |
| 1995        | 731-TA-715    | South Korea    | Affirmative                          | Order revoked, June 22, 2007                          |
| 1995        | 731-TA-716    | Mexico         | Affirmative                          | Order revoked, June 22, 2007                          |
| 1995        | 731-TA-717    | Spain          | Negative                             | ---   |
| 2002        | 701-TA-428    | Austria        | Negative                             | ---   |
| 2002        | 731-TA-992    | Austria        | Negative                             | ---   |
| 2002        | 731-TA-993    | Brazil         | Negative                             | ---   |
| 2002        | 731-TA-994    | China          | Negative                             | ---   |
| 2002        | 731-TA-995    | Colombia       | Petition withdrawn                   | ---   |
| 2002        | 731-TA-996    | France         | Negative                             | ---   |
| 2002        | 731-TA-997    | Germany        | Negative                             | ---   |
| 2002        | 731-TA-998    | India          | Negative                             | ---   |
| 2002        | 731-TA-999    | Indonesia      | Negative                             | ---   |
| 2002        | 731-TA-1000   | Romania        | Negative                             | ---   |
| 2002        | 731-TA-1001   | South Africa   | Negative                             | ---   |
| 2002        | 731-TA-1002   | Spain          | Negative                             | ---   |
| 2002        | 731-TA-1003   | Turkey         | Negative                             | ---   |
| 2002        | 731-TA-1004   | Ukraine        | Negative                             | ---   |
| 2002        | 731-TA-1005   | Venezuela      | Negative                             | ---   |
| 2009        | 701-TA-463    | China          | Affirmative                          | Order continued after second review, December 3, 2020 |
| 2009        | 731-TA-1159   | China          | Affirmative                          | Order continued after second review, December 3, 2020 |
| 2013        | 731-TA-1217   | Philippines    | Negative                             | ---   |
| 2013        | 731-TA-1218   | Saudi Arabia   | Investigation terminated by Commerce | ---   |
| 2013        | 731-TA-1219   | Taiwan         | Affirmative                          | Order revoked, July 28, 2017                          |
| 2013        | 731-TA-1220   | Thailand       | Negative                             | ---   |
| 2013        | 701-TA-499    | India          | Affirmative                          | Order continued after first review, August 12, 2020   |
| 2013        | 701-TA-500    | Turkey         | Affirmative                          | Order continued after first review, August 12, 2020   |

| Date | Number      | Country     | Determination | Current Status of Order                             |
|------|-------------|-------------|---------------|---|
| 2013 | 731-TA-1215 | India       | Affirmative   | Order continued after first review, August 12, 2020 |
| 2013 | 731-TA-1216 | South Korea | Affirmative   | Order continued after first review, August 12, 2020 |
| 2013 | 731-TA-1221 | Turkey      | Affirmative   | Order continued after first review, August 12, 2020 |
| 2013 | 731-TA-1222 | Ukraine     | Affirmative   | Order continued after first review, August 12, 2020 |
| 2013 | 731-TA-1223 | Vietnam     | Affirmative   | Order continued after first review, August 12, 2020 |

Source: U.S. International Trade Commission publications and Federal Register notices.

Note: "Date" refers to the year in which the investigation was instituted by the Commission.

### Safeguard investigations

Effective June 22, 2001, following receipt of a request from the Office of the United States Trade Representative ("USTR"), the Commission instituted investigation number TA-201-73 under section 202 of the Trade Act of 1974 to determine whether certain steel products, including seamless and welded OCTG, were being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industries producing articles like or directly competitive with the imported article.<sup>8</sup> On July 26, 2001, the Commission received a resolution adopted by the U.S. Senate Committee on Finance ("Committee") requesting that the Commission investigate certain steel imports under section 201 of the Trade Act of 1974.<sup>9</sup> Consistent with the Committee's resolution, the Commission consolidated the investigation requested by the Committee with the Commission's previously instituted investigation.<sup>10</sup> On December 20, 2001, the Commission issued its determinations and remedy recommendations. The Commission issued a negative determination with respect to OCTG.<sup>11</sup>

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<sup>8</sup> 66 FR 35267, July 3, 2001.

<sup>9</sup> 19 U.S.C. § 2251.

<sup>10</sup> 66 FR 44158, August 22, 2001.

<sup>11</sup> 66 FR 67304, December 28, 2001.

## Nature and extent of subsidies and sales at LTFV

### Subsidies

On September 29, 2022, Commerce published a notice in the Federal Register of its affirmative final determinations of countervailable subsidies for producers and exporters of OCTG from Russia<sup>12</sup> and South Korea.<sup>13</sup> Tables I-3 and I-4 present Commerce’s findings of subsidization of OCTG in Russia and South Korea.

**Table I-3**  
**OCTG: Commerce’s subsidy determinations with respect to imports from Russia**

| Entity  | Preliminary countervailable subsidy rate (percent) | Final countervailable subsidy rate (percent) |
|---|--|--|
| Volzhsky Pipe Plant, Joint Stock Company; Sinarsky Pipe Plant, Joint Stock Company; Seversky Pipe Plant, Joint Stock Company; Taganrog Metallurgical Plant, Joint Stock Company; Orsky Machine Building Plant, Joint Stock Company; and PAO TMK | 1.37   | 1.30   |
| JSC Vyksa Steel Works   | 1.68   | 1.59   |
| All others  | 1.53   | 1.43   |

Source: 87 FR 14249, March 14, 2022 and 87 FR 59047, September 29, 2022.

Note: Commerce has found the following companies to be cross-owned with Volzhsky Pipe Plant: TMK Neftegasservice-Nizhnevartovsk, Joint Stock Company; TMK Neftegasservice-Buzuluk, Limited Liability Company; Russian Research Institute of the Tube & Pipe Industries, JSC; and Scientific and Technical Center TMK, LLC. In addition, Commerce has found the following companies to be cross-owned with JSC Vyska Steel Works: BusinessOptima; Metallolomaya Company OMK—Ecometall; United Metallurgical Company; and Joint-Stock Company Trubodetal.

Note: For further information on programs determined to be countervailable, see Commerce’s associated Issues and Decision Memorandum.

<sup>12</sup> 87 FR 59047, September 29, 2022.

<sup>13</sup> 87 FR 59056, September 29, 2022.

**Table I-4****OCTG: Commerce's subsidy determinations with respect to imports from South Korea**

| Entity                    | Preliminary countervailable subsidy rate (percent) | Final countervailable subsidy rate (percent) |
|---------------------------|--|--|
| Hyundai Steel Corporation | 0.17 (de minimis)                                  | 0.25 (de minimis)                            |
| SeAH Steel Corporation    | 0.00   | 1.33   |
| All others                | ---  | 1.33   |

Source: 87 FR 14248, March 14, 2022 and 87 FR 59056, September 29, 2022.

Note: Commerce has found the following company to be cross-owned with SeAH Steel Corporation: SeAH Steel Holding Corporation.

Note: For further information, see Commerce's associated Issues and Decision Memorandum.

**Sales at LTFV**

On September 29, 2022, Commerce published a notice in the Federal Register of its affirmative final determinations of sales at LTFV with respect to imports from Argentina,<sup>14</sup> Mexico,<sup>15</sup> and Russia.<sup>16</sup> Tables I-5 through I-7 present Commerce's dumping margins with respect to imports of product from Argentina, Mexico, and Russia.

**Table I-5****OCTG: Commerce's weighted-average LTFV margins with respect to imports from Argentina**

| Exporter/producer | Preliminary dumping margin (percent) | Final dumping margin (percent) |
|-------------------|--------------------------------------|--------------------------------|
| Siderca S.A.I.C.  | 76.43                                | 78.30                          |
| All others        | 76.43                                | 78.30                          |

Source: 87 FR 28801, May 11, 2022 and 87 FR 59054, September 29, 2022.

**Table I-6****OCTG: Commerce's weighted-average LTFV margins with respect to imports from Mexico**

| Exporter/producer              | Preliminary dumping margin (percent) | Final dumping margin (percent) |
|--------------------------------|--------------------------------------|--------------------------------|
| Tubos de Acero de Mexico, S.A. | 69.56                                | 44.93                          |
| All others                     | 69.56                                | 44.93                          |

Source: 87 FR 28808, May 11, 2022 and 87 FR 59041, September 29, 2022.

<sup>14</sup> 87 FR 59054, September 29, 2022.

<sup>15</sup> 87 FR 59041, September 29, 2022.

<sup>16</sup> 87 FR 59045, September 29, 2022.

**Table I-7****OCTG: Commerce’s weighted-average LTFV margins with respect to imports from Russia**

| <b>Exporter/producer</b>  | <b>Preliminary dumping margin (percent)</b> | <b>Final dumping margin (percent)</b> |
|---|---|---------------------------------------|
| JSC Vyksa Steel Works   | 11.82                                       | 12.84                                 |
| Volzhsky Pipe Plant, Joint Stock Company/Public Joint-Stock Company Trubnaya Metallurgicheskaya Kompaniya/Sinarsky Pipe Plant, Joint Stock Company/Seversky Pipe Plant, Joint Stock Company/Taganrog Metallurgical Plant, Joint Stock Company/Pervouralsk Pipe Plant, Joint Stock Company/Chelyabinsk Pipe Plant, Joint Stock Company/Orsky Machine Building Plant, Joint Stock Company | 121.11                                      | 184.21                                |
| All others  | 70.49                                       | 12.84                                 |

Source: 87 FR 28804, May 11, 2022 and 87 FR 59045, September 29, 2022.

## The subject merchandise

### Commerce’s scope

In the current proceeding, Commerce has defined the scope as follows:<sup>17</sup>

*The merchandise covered by this investigation is certain OCTG, which are hollow steel products of circular cross-section, including oil well casing and tubing, of iron (other than case iron) or steel (both carbon and alloy), whether seamless or welded, regardless of end finish (e.g., whether or not plain end, threaded, or threaded and coupled) whether or not conforming to American Petroleum Institute (API) or non-API specifications, whether finished (including limited service OCTG products) or unfinished (including green tubes and limited service OCTG products), whether or not thread protectors are attached. The scope of this investigation also covers OCTG coupling stock.*

*Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise processed in a third country, including by performing any heat treatment, cutting, upsetting, threading, coupling, or any other finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the OCTG.*

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<sup>17</sup> 87 FR 59041, 59045, 59047, 59054, and 59056, September 29, 2022.



*Excluded from the scope of the investigation are: casing, tubing, or coupling stock containing 10.5 percent or more by weight of chromium; drill pipe; unattached couplings; and unattached thread protectors.*

## **Tariff treatment**

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations is imported under the following provisions of the Harmonized Tariff Schedule of the United States (“HTS”): 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150.<sup>18</sup> The 2021 general rate of duty is “Free” for HTS subheadings 7304.29.10, 7304.29.20, 7304.29.31, 7304.29.41, 7304.29.50, 7304.29.61, 7305.20.20, 7305.20.40, 7305.20.60, 7305.20.80, 7306.29.10, 7306.29.20, 7306.29.31, 7306.29.41, 7306.29.60, and 7306.29.81.<sup>19</sup> Effective April 9, 2022, imports of all products of Russia are subject to duty rates set forth in column 2 of the HTS. Effective July 27, 2022, the column 2 rate of duty was raised to 35.0 percent ad valorem for certain articles of Russia, including OCTG provided for in HTS subheadings 7304.29.10, 7304.29.20, 7304.29.31, 7304.29.41, 7304.29.50, 7306.29.20, and 7306.29.60 (OCTG not provided for in those HTS subheadings is subject to regular column 2 rates of duty).<sup>20</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection (“CBP”).

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<sup>18</sup> The goods subject to the investigations may also enter under the following HTS statistical reporting numbers: 7304.39.0024, 7304.39.0028, 7304.39.0032, 7304.39.0036, 7304.39.0040, 7304.39.0044, 7304.39.0048, 7304.39.0052, 7304.39.0056, 7304.39.0062, 7304.39.0068, 7304.39.0072, 7304.39.0076, 7304.39.0080, 7304.59.6000, 7304.59.8015, 7304.59.8020, 7304.59.8025, 7304.59.8030, 7304.59.8035, 7304.59.8040, 7304.59.8045, 7304.59.8050, 7304.59.8055, 7304.59.8060, 7304.59.8065, 7304.59.8070, 7304.59.8080, 7305.31.4000, 7305.31.6090, 7306.30.5055, 7306.30.5090, 7306.50.5050, and 7306.50.5070. USITC, HTS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 73-6 – 73-19.

<sup>19</sup> USITC, HTS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 73-6 – 73-16.

<sup>20</sup> 87 FR 38875, June 30, 2022. The standard column 2 rates of duty range from 1.0 percent to 35.0 percent for seamless OCTG and 1.0 percent to 28.0 percent for welded OCTG. USITC, HTS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 73-6 – 73-16.

## Section 232 and 301 tariff treatment

### OCTG

Effective March 23, 2018, OCTG imports originating in Russia and most nonsubject countries are subject to an additional 25 percent ad valorem duty under Section 232 of the Trade Expansion Act of 1962, as amended. OCTG imports originating in Mexico are currently exempted from Section 232 duties and quotas. OCTG imports originating in Argentina and South Korea are also exempted from Section 232 duties but are instead subject to aggregate absolute import quotas of 147,963,294 kilograms (163,102 short tons) per year for Argentina and 460,867,818 kilograms (508,020 short tons) per year for South Korea.<sup>21</sup> The history of Section 232 Presidential proclamations is included in appendix D. OCTG produced in China, a nonsubject country, is currently subject to an additional 7.5 percent ad valorem duty under Section 301 of the Trade Act of 1974.<sup>22</sup>

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<sup>21</sup> Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. §1862), authorizes the President, on advice of the Secretary of Commerce, to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security. 83 FR 11625, March 15, 2018.

See also HTS heading 9903.80.01 and 9903.80.03 and U.S. notes 16(a) and 20(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 99-III-5 – 99-III-6, 99-III-263.

Section 232 import duties on steel products currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are exempt from Section 232 duties and quotas on steel products, while imports from Argentina, Brazil, and South Korea are exempt from duties but are instead subject to absolute quotas. EU Member States (effective January 1, 2022), Japan (effective April 1, 2022), and the United Kingdom (effective June 1, 2022) are currently subject to tariff-rate quotas (“TRQs”) for steel products, and imports that exceed the TRQ limits are subject to the Section 232 tariffs. Section 232 import duties on steel products for Turkey were temporarily raised from 25 percent to 50 percent, effective August 13, 2018, to May 21, 2019. In addition, Section 232 duties on steel products of Ukraine are suspended, effective June 1, 2022, to June 1, 2023. 83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022; U.S. Customs and Border Protection (“CBP”), “QB 22-603 2022 Third Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea,” <https://www.cbp.gov/trade/quota/bulletins/22-603>, June 28, 2022; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022.

<sup>22</sup> The U.S. Trade Representative imposed the tariffs under section 301 of the Trade Act of 1974 after determining that certain acts, policies, and practices of China are unreasonable or discriminatory and burden or restrict U.S. commerce (82 Fed. Reg. 40213, August 24, 2017; 83 FR 14906, April 6, 2018). OCTG was included in the fourth enumeration (“Tranche 4”) of goods produced in China that are subject to additional Section 301 duties. Tranche 4 tariffs of 10 percent were to go into effect September 1, (continued...)

## Hot-rolled steel sheet

Hot-rolled steel sheet in coil form (“hot-rolled coil”) is not a subject product, but it is used to manufacture welded OCTG. Effective March 23, 2018, hot-rolled coil imports originating in most countries are subject to a 25 percent ad valorem duty under Section 232 of the Trade Expansion Act of 1962, as amended (see the OCTG Section 232 and 301 tariff treatment section above for a complete description of countries subject to Section 232 tariffs).<sup>23</sup> Hot-rolled coil produced in China, a nonsubject country, is currently subject to an additional 7.5 percent ad valorem duty under Section 301 of the Trade Act of 1974.<sup>24</sup>

## The product

### Description and applications<sup>25</sup>

OCTG consists primarily of casing and tubing of carbon and alloy steel used in the drilling of oil and gas wells and in the conveying of oil and gas from within the well to ground level.<sup>26</sup>

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2019 (84 FR 43304, August 20, 2019). However, before Tranche 4 tariffs went into effect, the duty was raised to 15 percent ad valorem, with the same effective date of September 1, 2019 (84 FR 45821, August 30, 2019) and was more recently reduced to 7.5 percent ad valorem, effective February 14, 2020. 85 FR 3741, January 22, 2020.

See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 99-III-86 – 99-III-100, 99-III-293.

<sup>23</sup> 83 FR 11625, March 15, 2018. See also HTS heading 9903.80.01 and 9903.80.03 and U.S. notes 16(a) and 20(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 99-III-5 – 99-III-6, 99-III-263.

<sup>24</sup> See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 99-III-86 – 99-III-100, 99-III-293.

<sup>25</sup> Unless otherwise noted, this information is based on *Oil Country Tubular Goods from Argentina, Mexico, Russia, and South Korea, Inv. Nos. 701-TA-671-672 and 731-TA-1571-1573 (Preliminary)*, USITC Publication 5248, November 2021 (“preliminary publication”), pp. I-14 through I-21.

<sup>26</sup> The World Steel Association has defined five end use categories for steel pipe and tube: standard pipe, line pipe, structural pipe and tubing, mechanical tubing, and oil country tubular goods. Standard pipe is “used for low-pressure conveyance of air, steam, gas, water, oil or other fluids and for mechanical applications. Used primarily in machinery, buildings, sprinkler systems, irrigation systems, and water wells rather than in pipelines or distribution systems.” Line pipe is “used for transportation of gas, oil or water generally in a pipeline or utility distribution system.” Structural pipe and tubing is “welded or seamless pipe and tubing generally used for structural or load-bearing purposes above-ground by the construction industry, as well as for structural members in ships, trucks, and farm equipment.” Mechanical tubing is “welded or seamless tubing produced in a large number of shapes to closer tolerances than other pipes” and is used for mechanical and light gauge structural applications. (continued...)

OCTG is manufactured by either the seamless or welded process. Both seamless OCTG and welded OCTG are used in drilling and conveyance applications, although seamless OCTG generally is required for use in high-pressure or sour service environments. A sour service well contains hydrogen sulfide gas which can potentially result in sulfide stress cracking in the welded seam of welded OCTG. A well containing a higher level of hydrogen sulfide gas would require seamless OCTG, but welded OCTG reportedly can be used in some sour service applications where there are lower levels of hydrogen sulfide gas present in the well.

Figure I-1 shows a simplified schematic arrangement of a typical well with a system of casing and tubing. Figure I-2 presents a more detailed representation of an oil or gas well, including descriptions of different types of casing by depth and function.

Advancements in oil and gas exploration technologies, including advanced horizontal drilling<sup>27</sup> and hydraulic fracturing (figure I-3),<sup>28</sup> have enabled oil and gas wells to reach locations that were previously deemed cost-prohibitive. In addition, the application of new technologies permits more wells per acre, thus increasing oil and gas production and recoverable reserves.

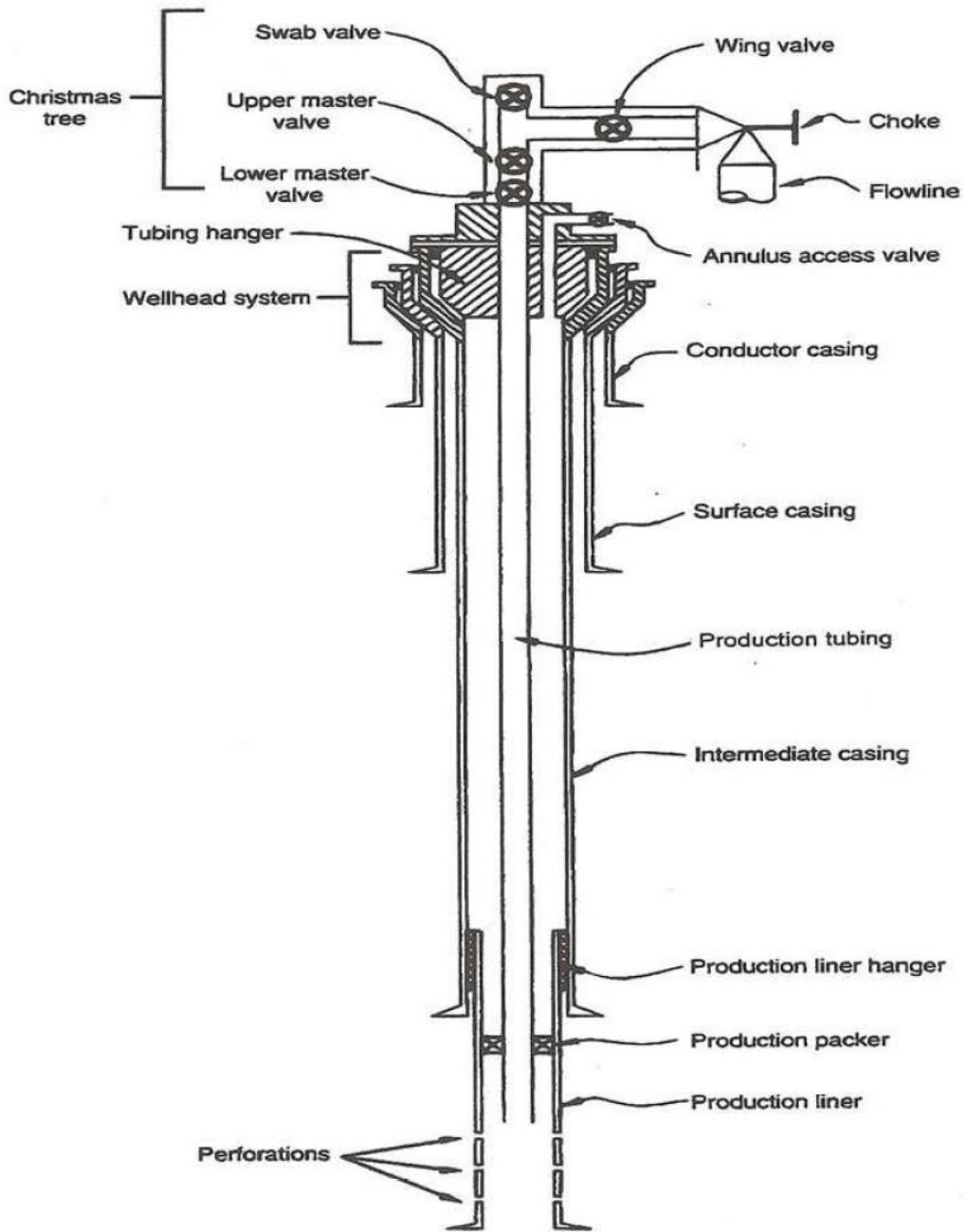
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The World Steel Association, "Glossary," <https://worldsteel.org/about-steel/glossary/>, retrieved October 4, 2022. Wheatland Tube, "Mechanical tubing vs. structural tubing," <https://www.wheatland.com/archives/3094>, retrieved October 13, 2022.

<sup>27</sup> Horizontal drilling is a variant of directional drilling in which vertical drilling within a well turns horizontal within the reservoir rock to expose more of the wellbore to the oil or natural gas. More oil and natural gas can be produced from fewer wells with less surface disturbance. American Petroleum Institute (API), "Advanced Drilling Techniques," found at <http://www.api.org/oil-and-natural-gas-overview/exploration-and-production/natural-gas/advanced-drilling>, retrieved July 19, 2022. On September 23, 2022, 91 percent of active rotary rigs (693 rigs) in the United States employed horizontal drilling, while 6 percent (46 rigs) employed directional drilling; the remaining 3 percent (25 rigs) employed vertical drilling. Baker Hughes International Inc., "North American Rotary Rig Count," September 23, 2022, found at <https://rigcount.bakerhughes.com/static-files/fd0ae9a3-4c01-432a-b43d-8263efbace2c>, retrieved September 29, 2022. The footage of onshore wells drilled in the United States \*\*\* from \*\*\* feet in 2019 to \*\*\* feet in 2020. Footage drilled \*\*\* to \*\*\* feet in 2021 and was projected to \*\*\* to \*\*\* feet in 2022. \*\*\*.

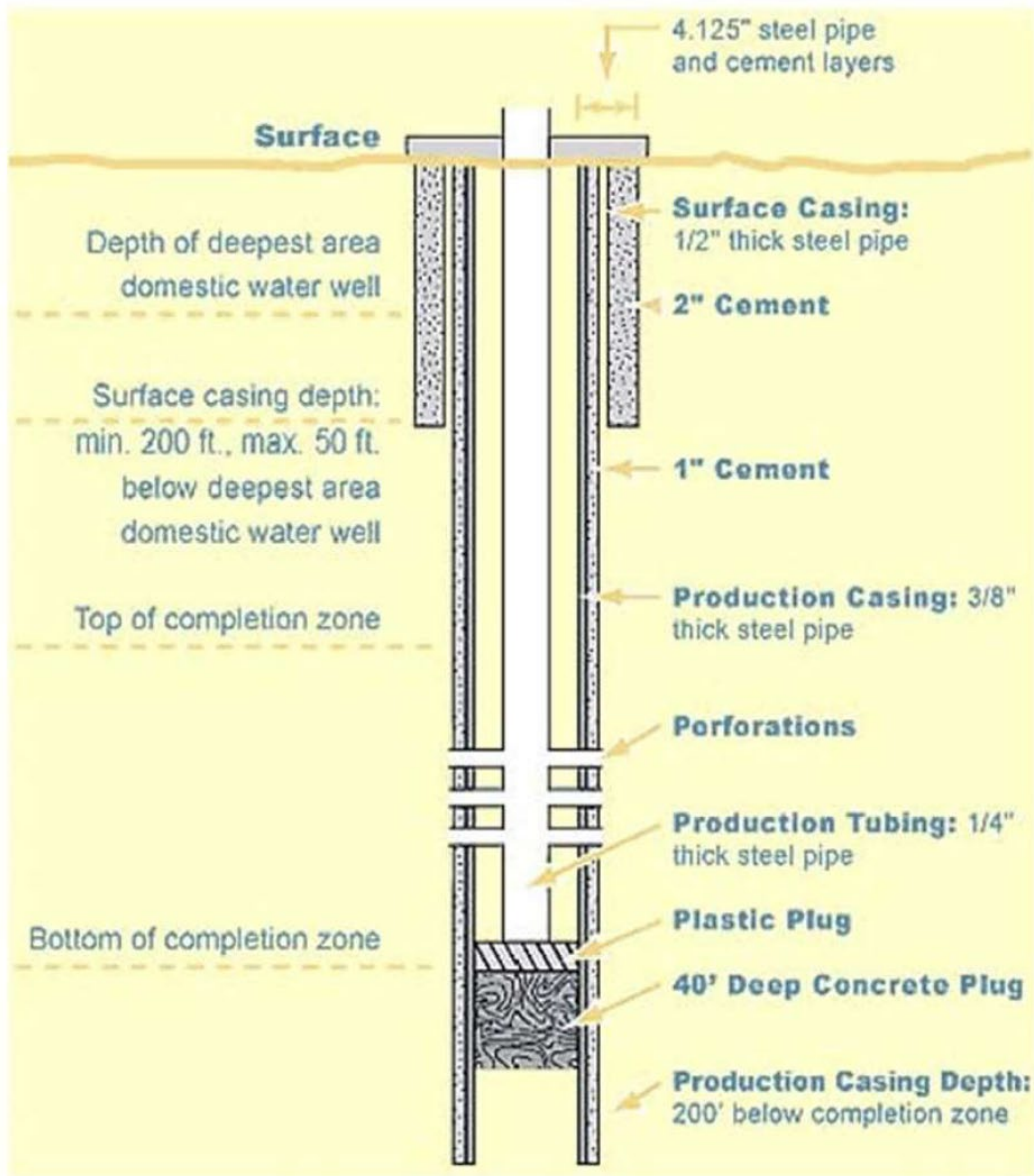
<sup>28</sup> Hydraulic fracturing (commonly referred to as "fracking") requires the high-pressure injection of a mixture of water, sand, and chemicals through the well and into the surrounding shale rock formations, creating a network of narrow fractures in the rock. The fractures allow more oil and natural gas to enter through perforations made in the casing and tubing.

**Figure I-1**  
**Casing and tubing: Simplified diagrammatic representation of a well showing the casing strings and production tubing**



Source: Introduction to Oil and Gas Production, Fifth Edition, American Petroleum Institute, June 1996, p. 11.

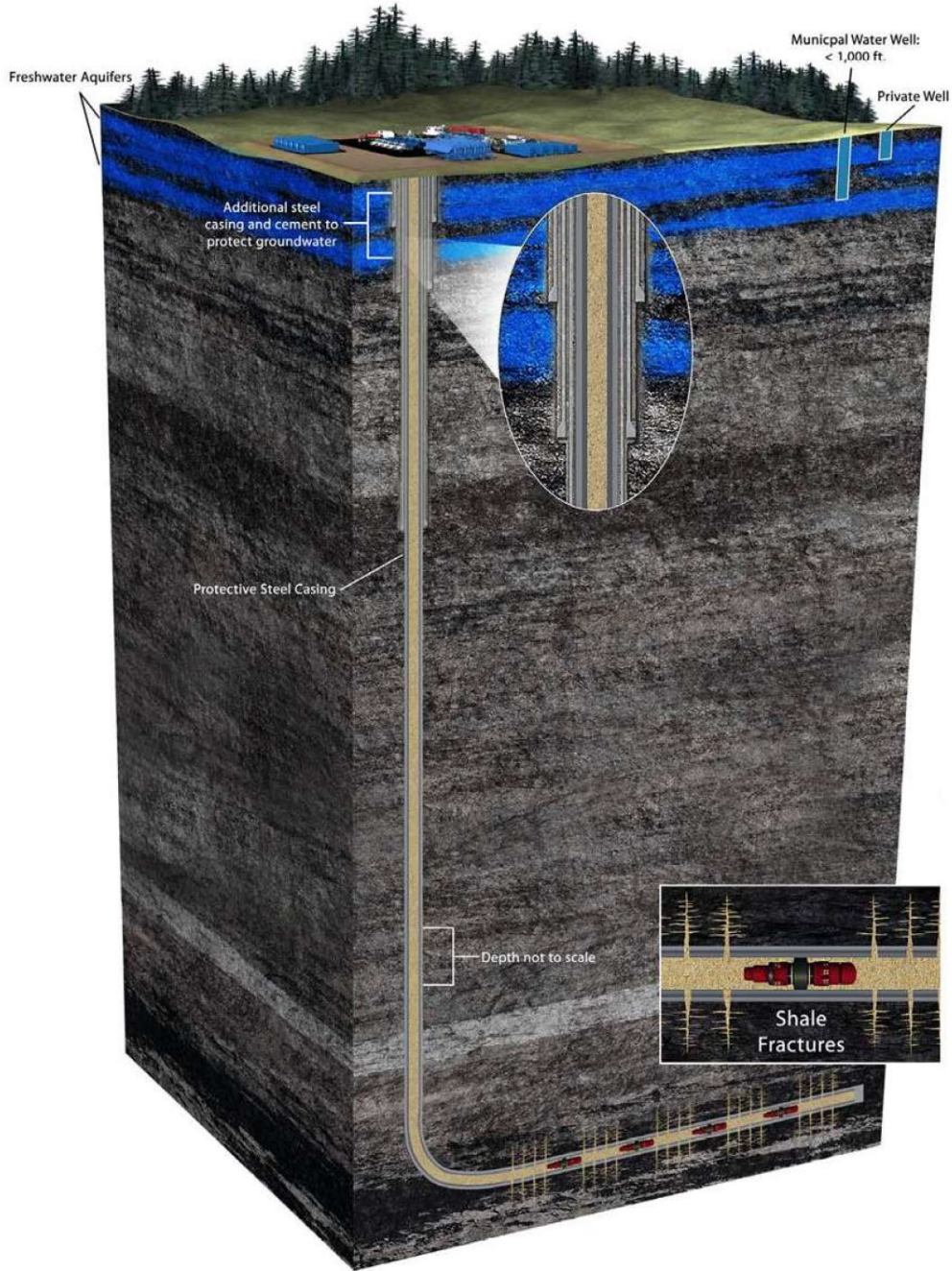
**Figure I-2**  
**Casing and tubing: Subsurface components of an oil or gas well, including descriptions of different types of casing by depth and function**



Source: The Energy Council, "Facts," found at <https://energycouncil.org/facts/#about-natural-gas>, retrieved July 12, 2022.



**Figure I-3**  
**Casing and tubing: Horizontal drilling and hydraulic fracturing**



Source: American Petroleum Institute (API), "The Facts About Hydraulic Fracturing and Seismic Activity," 2013.

Casing is a circular pipe that serves as a structural retainer for the walls of the well. Casing typically has an outside diameter (OD) ranging from 4.5 inches to 20 inches and a length typically ranging from 34 feet to 48 feet. Casing provides a firm foundation for the drill string<sup>29</sup> by supporting the walls of the hole to prevent caving in or wall collapse both during drilling and after the well is completed. After the casing is set in the well hole, concrete is usually pumped into the annulus (the space between the well wall and the casing) until the annulus is filled.

Casing also serves as a surface pipe designed to prevent contamination of the recoverable oil and gas by surface water, gas, sand, or limestone. Casing must be sufficiently strong to carry its own weight, as well as to resist both external pressure and pressure within the well. Casing can be threaded at both ends and connected with other casing pieces with couplings or connectors. Because the amount of open hole that can be drilled at any one time is limited, larger wells require a string of concentric layers of casing rather than a single casing. Several sizes of casing may be set inside the well after it has been drilled, with the larger sizes set at the top of the well, and the smaller sizes set toward the bottom.

Tubing is a smaller-diameter pipe (between 1.050–4.5 inches OD) installed inside the larger-diameter casing that is used to conduct the oil or gas to the surface, either through natural flow or through pumping. Substances such as lubricants are also pumped into the well through the tubing for well treatment. Tubing must be strong enough to support its own weight, that of the oil or gas, and that of any pumping equipment suspended on the string. Tubing, like casing, usually is produced in accordance with API specification 5CT.

The API specification 5CT designates 11 separate grades of casing and tubing, identified by a letter and a number: H40, J55, K55, N80, L80, C90, R95, T95, P110, C110, and Q125 (table I-8).<sup>30</sup> The API grade letter is an arbitrary designation, while the number refers to minimum yield strength in thousands of pounds per square inch (“ksi”).<sup>31</sup> In addition, an API grade may be further delineated by chemical composition, method of production (i.e., seamless or welded), dimension, heat treatment, testing procedures, and other engineering specifications, depending on customers’ requirements.<sup>32</sup> Most API grades provide for seamless and welded

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<sup>29</sup> The drill string consists of drill pipe, drill collars, and the drill bit.

<sup>30</sup> Techstreet Store, “API SPEC 5CT.” [https://www.techstreet.com/standards/api-spec-5ct?product\\_id=2016190](https://www.techstreet.com/standards/api-spec-5ct?product_id=2016190), retrieved July 19, 2022.

<sup>31</sup> Thus, Q125 has a higher yield strength than grades J55 or K55 (J55 and K55 differ with respect to minimum tensile strengths).

<sup>32</sup> For example, Grade L80, type 9Cr must contain 8-10 percent chromium by weight, be produced by the seamless manufacturing process, and be quenched and tempered.



production methods. API grades H40, J55, and K55 generally refer to carbon grades that have lower minimum yield strengths and that do not require heat treatment. All other API grades require some form of heat treatment.

**Table I-8**  
**API 5CT specifications**

| Grade | Type           | Manufacturing Process | Heat Treatment |
|-------|----------------|-----------------------|----------------|
| H40   | Not applicable | ***                   | ***            |
| J55   | Not applicable | ***                   | ***            |
| K55   | Not applicable | ***                   | ***            |
| N80   | 1              | ***                   | ***            |
| N80   | Q              | ***                   | ***            |
| R95   | Not applicable | ***                   | ***            |
| L80   | 1              | ***                   | ***            |
| L80   | 9Cr            | ***                   | ***            |
| L80   | 13Cr           | ***                   | ***            |
| C90   | 1              | ***                   | ***            |
| T95   | 1              | ***                   | ***            |
| C110  | Not applicable | ***                   | ***            |
| P110  | Not applicable | ***                   | ***            |
| Q125  | 1              | ***                   | ***            |

Source: \*\*\*, found in Petitioners' postconference brief, Exhibit 10. Octal Steel, API 5CT casing and tubing specification, found at <https://www.octalsteel.com/api-5ct-specification>, retrieved October 13, 2022.

Heat treatment enhances particular physical characteristics, including greater yield and tensile strengths. Generally, as the depth and pressure in a well increases, heat treated OCTG would be required because of its higher strength. Shallow (close to the surface) OCTG applications that are not subject to greater pressure do not require heat treated OCTG. However, in limited sour service environments where stronger OCTG does not perform well, OCTG that has not been heat treated would be required.<sup>33</sup> Heat treated OCTG is generally more expensive than OCTG that has not been heat treated.

As noted above, not all OCTG requires heat treatment. For OCTG that may require heat treatment there are two categories of tubular products. Tubular products in the first category are often referred to as "green tube" (or less frequently "green pipe") and typically meet certain basic API requirements, such as those for diameter and wall thickness. The underlying

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<sup>33</sup> A representative of B&L Pipeco Services Inc. estimated that OCTG that has not been heat treated would only be required in about 2 percent of uses. Conference transcript, pp. 102-103 (Tait).

steel is produced to a customer's specification so that the green tube can be converted into the required casing or tubing product, but the green tube itself is not sold "at grade."

Tubular products in the second category already meet and are certified to API 5CT specifications for casing and tubing but are produced with a steel chemistry that allows them to be upgraded. Such upgradeable OCTG is sometimes referred to as green tube, but industry practice is less consistent, since the upgradeable product is certified to chemical and mechanical properties, has an API monogram, and (as discussed below) does not require heat treatment.

Upgradeable OCTG that meets the minimum specifications for lower-grade API 5CT casing and tubing (i.e., H40 and J55) can be certified to those grades and used in applications not requiring additional heat treatment.<sup>34</sup> Alternatively, depending on its steel composition and wall thickness, upgradeable OCTG that meets non-heat treatable API grades of casing and tubing can be subsequently heat treated to increase yield and tensile strengths to meet the minimum specifications for higher-grade API 5CT casing and tubing (e.g., P110).<sup>35</sup>

Finally, finished casing and tubing typically refers to product that has been heat treated (if required), tested, threaded, and coupled.

Limited service OCTG is OCTG that does not meet API specifications but can still be used in certain OCTG applications such as in shallower wells with lower pressure. Limited service OCTG is sold without the same warranties that would come with OCTG that meets API specifications.

Coupling stock is a thick-walled, seamless tubular product used to manufacture coupling blanks. Coupling blanks, in turn, are unthreaded tube blanks used to make individual couplings. Couplings are thick-walled and internally threaded seamless cylinders that are used for joining two lengths of threaded OCTG. Couplings are produced and certified to the same API grade and type as the OCTG to which the couplings are joined. Coupling typically accounts for 2-3 percent of the weight of end-finished tubing or casing.

## **Manufacturing processes**

OCTG mills manufacture casing and tubing by either of two distinct types of operations: the seamless process or the electric-resistance-welding ("ERW") process. By contrast, mills manufacture coupling stock for OCTG couplings exclusively through the seamless process.

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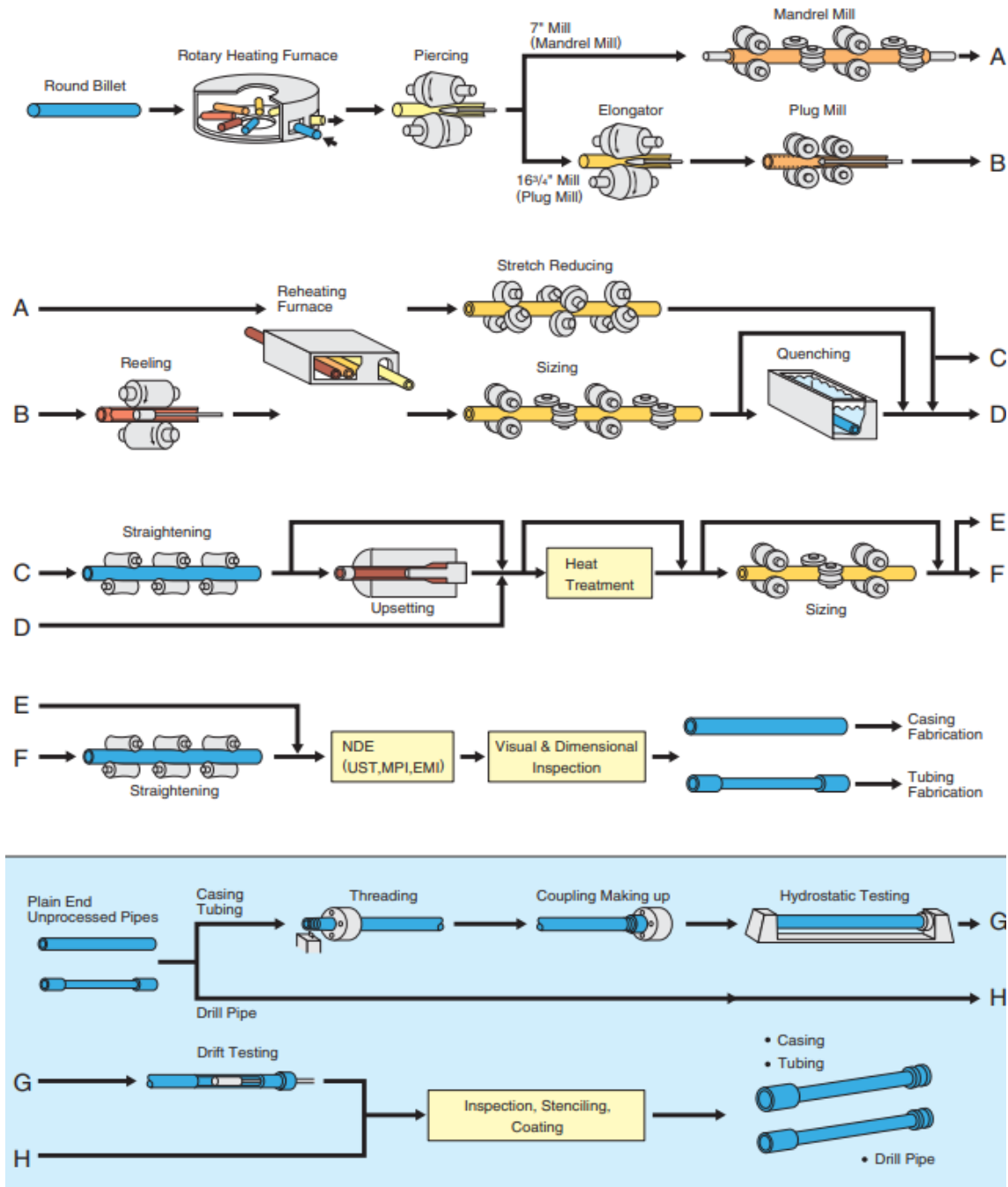
<sup>34</sup> Green tube certified to these grades undergo further finishing operations, including threading.

<sup>35</sup> All grades are threaded in one form or another to finish the pipe.

Seamless OCTG is manufactured by either of two high-temperature methods to form a central cavity in a solid steel billet; namely, the rotary piercing method or the hot extrusion method. Round or square billets serve as the input for seamless tubing (figure I-4). If a square billet is used, it is first forced through a circular roll pass, which transformed the billet from square to round for the piercing operation. In the rotary piercing method, the heated billet is gripped by angled rolls, which cause the billet to rotate and advance over a piercer point, forming a hole through the length of the billet. In the extrusion method, the billet is hot punch-pierced and then extruded axially through a die and over a mandrel, forming a hollow shell. The hollow shell produced by either method is then rolled with a fixed plug or with a continuous mandrel inside the shell to reduce the wall thickness and increase the shell's length. Finally, the shell is rolled in a sizing mill or a stretch-reducing mill where it is formed to size.

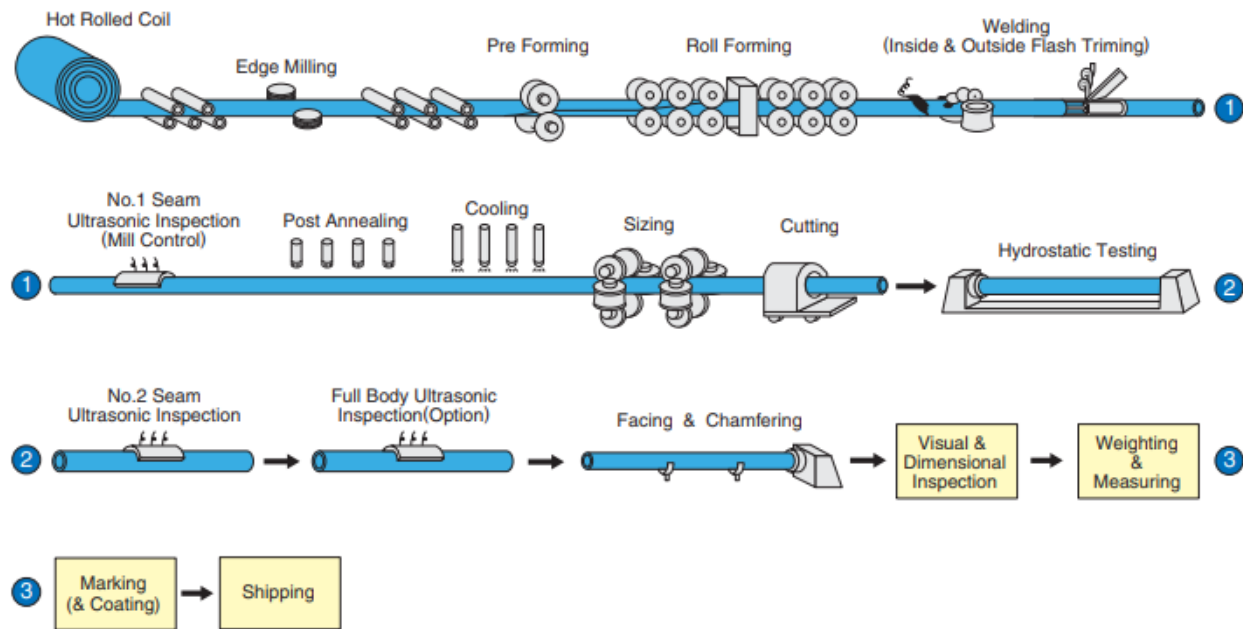
Welded OCTG is manufactured from hot-rolled steel sheet in coil form ("hot-rolled coil") (figure I-5). The hot-rolled coil is slit to the width that corresponds to the desired diameter of tube. The slit hot-rolled coil passes through a series of rollers while at ambient temperature and forms a tubular shape. The edges are then heated by electric resistance and welded together by heat and pressure, without the addition of filler metal. The welding pressure causes some of the metal to be squeezed from the welding joint, forming a bead of metal on the inside and outside of the tube. This bead, or welding flash, is usually trimmed from both the outside and the inside surfaces.

**Figure I-4**  
**Casing and tubing: Seamless manufacturing process**



Source: JFE Steel Corporation, OCTG (Product Catalog), found at <https://www.jfe-steel.co.jp/en/products/pipes/catalog/e1e-012.pdf>, retrieved July 19, 2022.

**Figure I-5**  
**Casing and tubing: General schematic of the ERW manufacturing process**



Source: JFE Steel Corporation, OCTG (Product Catalog), found at <https://www.jfe-steel.co.jp/en/products/pipes/catalog/e1e-012.pdf>, retrieved July 19, 2022.

### Finishing phase

After the forming phase, the pipe body is heat-treated, and its ends upset, threaded and coupled, as needed. U.S. pipe mills typically are equipped with the facilities necessary to perform these processes. Independent processors operate facilities that are capable of full-body heat treatment and that may upset pipe ends.<sup>36</sup> Threaders are capable of threading and coupling, hydrostatic testing, and measuring the length of OCTG products. Some processors and threaders may also manufacture couplings that become part of finished OCTG. Processors and threaders mainly serve imports, since OCTG is often imported with plain ends, and are heat treated, upset, and threaded in the United States. This approach provides the flexibility to offer

<sup>36</sup> API defines a processor as: “firm, company, or corporation that operates facilities capable of heat treating pipe made by a pipe mill.” Most processors typically perform threading operations, although many threaders do not perform processing operations. Discussion of independent threaders is limited in this report, as the Commission in past OCTG investigations has not deemed independent threaders to be part of the domestic industry producing casing and tubing. *Oil Country Tubular Goods from Argentina, Italy, Japan, Korea, and Mexico, Investigation Nos. 731-TA-711 and 713-716 (Second Review)*, USITC Publication 3923, June 2007, p. 9. *Certain Oil Country Tubular Goods from India, Korea, Turkey, Ukraine, and Vietnam, Inv. Nos. 701-TA-499-500 and 731-TA-1215-1216, 1221-1223 (Review)*, USITC Publication 5090, July 2020, pp. 7–8, I-30.

casing and tubing in compliance with a variety of specifications, thus allowing them to serve a wide range of consumer needs.

### **Heat treatment**

In the steel manufacturing process, specific engineering characteristics and mechanical properties of the steel can be achieved through the application of different heat treatments. Heat treating may involve one or more heating cycles in either a continuous or batch furnace, with controlled rates of cooling. Specific heat treating requirements depend on the grade of steel being processed. For welded pipe, the heat treatment may cover the welded seam only, or the full cross section of the pipe. API standards specify a documented procedure for every grade and type of pipe. API-specific heat treatment processes in the production of casing and tubing include annealing, normalizing, and quench and tempering.

Annealing is a single heat treatment process that prepares the steel for fabrication or service. The steel is heated to a temperature in or near a specific range and cooled at a predetermined rate or cycle. Annealing relieves internal residual stresses or hardness induced by welding, cold working, or machining.

In the normalizing process, the pipe is heated above a specific temperature, held at this temperature for a specified time, and then air-cooled. Normalizing refines the steel grain size and obtains a carbide size and distribution that is more suitable for future heat treatment than the as-rolled structure.

Quenching and tempering is a sequential process in which the pipe is heated to a specific temperature for a specified time period to modify the steel's microstructure, and then "quenched" in a cooling medium such as water, oil, or air, depending on the thickness of the pipe. After quenching, the steel is very brittle and must be reheated and then cooled under specific conditions. This process is called "tempering." The pipe must undergo a specified process of quenching and tempering in order to qualify for certain API grades.

Depending on the pipe design, API standards may specify a single heat treatment process or a combination of processes for the pipe, such as normalizing and tempering, or quenching and tempering. After heat treatment, sizing rolls shape the tube to accurate diameter tolerances. The product is cooled and then cut to length at the end of the tube mill.

Coupling stock is made to the same grade and type specifications as casing and tubing. It must also be subject to the same heat treatment as pipe, except where specified by the purchaser.

## Upsetting and threading

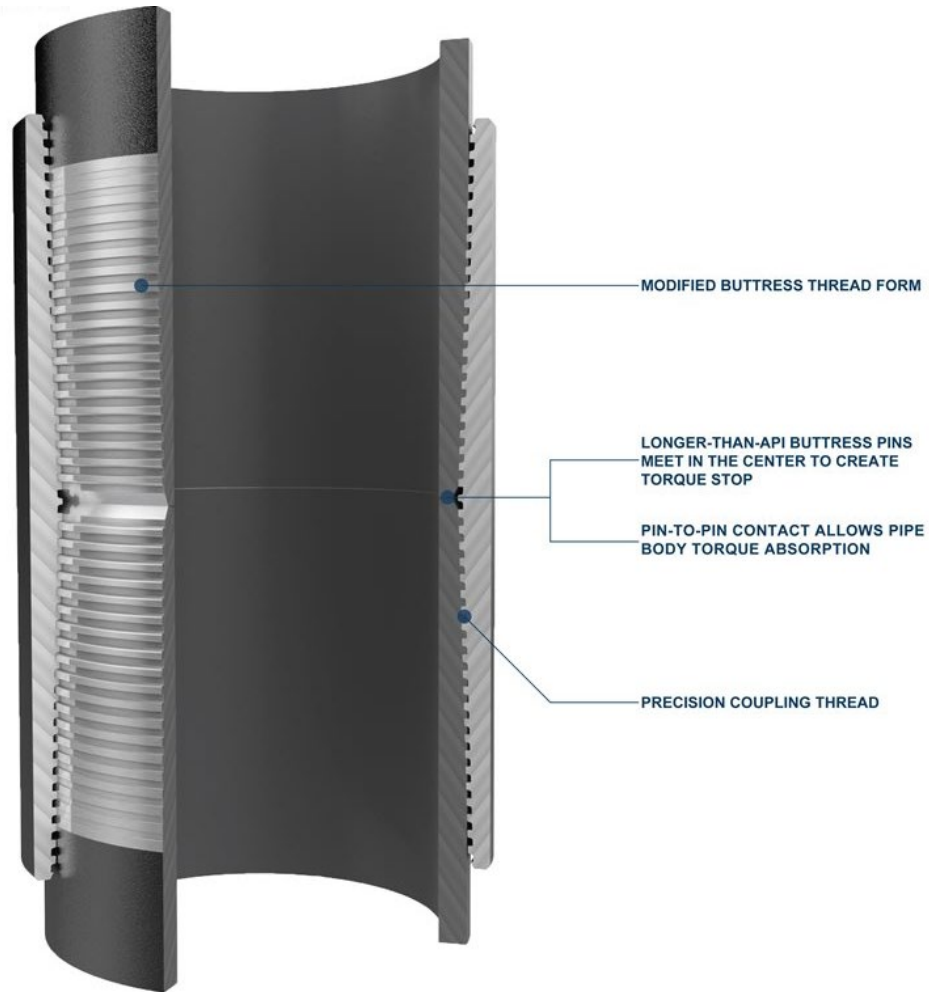
Casing and tubing are finished by threading and the attachment of a suitable coupling to one end of each length. If additional strength in the joint is required, such as for some casing or tubing that is subject to severe or sour service, the ends of the pipe are upset before threads are cut. In the upsetting process, the end of the pipe is heated to forging temperature, and then inserted endwise into an upsetting machine. The machine pushes the hot metal back, creating a thicker wall at the end of the pipe. The upsetting may be controlled to displace the extra thickness to the inside or the outside of the pipe.

Casing and tubing can be joined directly using male (outer) and female (inner) threading, or by using couplings with female threads on each end. Typically, the pipe is mounted on a lathe and threads are cut by using sharp steel cutting tools (called chasers), which are mounted on a threading die surrounding the pipe. As the pipe is turned on the lathe, the threading die moves along the pipe's axis, producing the required spiral cut on the inner or outer surface of the pipe. Threading can be made to meet API standards, or made to proprietary standards that are designed, registered, and protected by patents or other intellectual property rights mechanism and that are not specified by API standards. For instance, OCTG producers may market proprietary "semi-premium" or "premium" threaded connections that provide higher torsional loads, bending resistance, or greater sealability for casing in challenging drilling environments. Premium threaded connections generally refer to OCTG connections that have a metal-to-metal, gas-tight seal to ensure pressure integrity. Semi-premium connections generally refer to connections that do not have a metal-to-metal seal, yet maintain water-tight sealability, and thus may be used in less demanding wells with no gas-tight sealability requirements. Examples of threaded and coupled semi-premium and premium connections are shown in figures I-6 and I-7. After threading, a thread protector is applied to the threaded pipe ends during handling, transportation, or storage.<sup>37</sup>

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<sup>37</sup> Threading can be performed after transportation to avoid damage caused by movement, water, or weather. Damaged threads can cause expensive ruptures of the pipe string in casing and tubing applications where pipes are connected to one another by threaded joints.

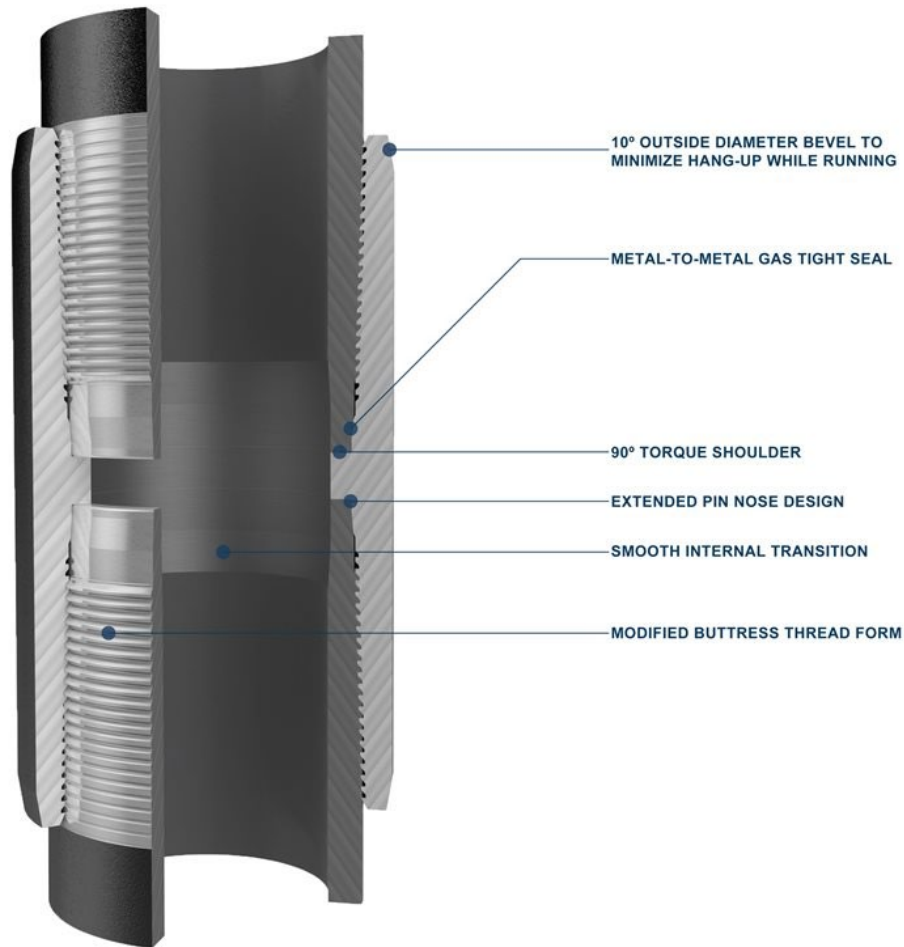
**Figure I-6**  
**Casing and tubing: Threaded and coupled semi-premium connection**



Source: U.S. Steel Tubular Products, "USS-CDC® Semi-Premium OCTG Connections," found at <https://usstubular.com/octg-products-and-services/octg-connections/semi-premium-connections/uss-cdc/>, retrieved July 19, 2022.



**Figure I-7**  
**Casing and tubing: Threaded and coupled premium connection**



Source: U.S. Steel Tubular Products, "USS-PATRIOT EBM® Premium OCTG Connections," found at <https://usstubular.com/octg-products-and-services/octg-connections/premium-connections-metal-to-metal-seal/uss-patriot-ebm/>, retrieved July 19, 2022.

## Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. In the preliminary phase of these investigations, the Commission defined a single domestic like product consisting of all domestically produced OCTG, coextensive with the scope of these investigations.<sup>38</sup> The Commission issued draft questionnaires for comment in the final phase of these investigations on January 10, 2022. No party requested the collection of additional information regarding the domestic like product. No party proposed an alternative domestic like definition during the hearing, or in their prehearing or posthearing briefs.

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<sup>38</sup> Oil Country Tubular Goods from Argentina, Mexico, Russia, and South Korea, Inv. Nos. 701-TA-671-672 and 731-TA-1571-1573 (Preliminary), USITC Publication 5248, November 2021, p. 14.

## Part II: Conditions of competition in the U.S. market

### U.S. market characteristics

Seamless OCTG and welded OCTG includes casing and tubing for use in oil and natural gas exploration and production. Both vertical drilling and horizontal drilling employ casing for structural integrity and tubing for liquid and gas flow (including traditional extraction and hydraulic fracturing or “fracking,” which requires a high-pressure injection of fracturing fluid into the well). Since January 2000, and continuing since January 2019, the production of horizontal wells has increased relative to vertical wells. Horizontal wells now constitute the vast majority of the oil and natural gas wells in the United States. Horizontal wells typically require more casing and tubing than vertical wells because of the greater drilling distances (in terms of footage), which has caused the average amount of OCTG required per well to increase over time.

Petitioners and Tenaris differed on how often seamless and welded OCTG were used interchangeably. Petitioners described seamless and welded OCTG as interchangeable in almost all end uses, except for a few high-stress applications that require seamless.<sup>1</sup> Tenaris described seamless and welded OCTG as having only “limited” interchangeability.<sup>2</sup>

Since January 1, 2019, the U.S. OCTG market has seen pronounced swings in demand and supply. Reaction to the COVID-19 pandemic in early 2020 caused to a steep decline in oil and gas prices, contributing to a reduction in OCTG demand. This decline in demand led to postponement or cancellation of planned capacity increases. While demand began to rise again in late 2021 and early 2022, supply has been slower to recover, with higher prices and some shortages of OCTG.

Apparent U.S. consumption of OCTG fluctuated during January 2019-June 2022. Apparent U.S. consumption decreased sharply from 5.3 million short tons in 2019 to 2.7 million short tons in 2020, before partially recovering to 3.5 million short tons in 2021. In the first half of 2022, apparent U.S. consumption was 2.4 million short tons, 70.6 percent higher than in the first half of 2021.<sup>3</sup>

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<sup>1</sup> Petitioners’ prehearing brief, p. 19.

<sup>2</sup> Tenaris’s prehearing brief, p. 37.

<sup>3</sup> See Part IV for additional data on movements of OCTG based on inventory changes.

Twelve U.S. producers and 21 importers stated that there had not been any changes in the product mix, product range, or marketing of OCTG since January 1, 2019.<sup>4</sup> Three U.S. producers and four importers did describe such changes. Among these firms, U.S. producer \*\*\* stated that consumption of small diameter OCTG has increased since 2019. Two importers described increased demand for seamless OCTG. \*\*\* described the OCTG market as “very dynamic” with continuous changes in product technology to improve drilling capabilities. U.S. producer \*\*\* described oil and gas drillers as making changes in well design to deal with shortages in OCTG supply.

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<sup>4</sup> Eight firms submitted both U.S. producers’ questionnaires and importers’ questionnaires. Three firms \*\*\* imported from nonsubject countries. Additionally, U.S. producer \*\*\*. For the purposes of this chapter, responses from all these questionnaires are counted.

## U.S. purchasers

The Commission received 29 usable questionnaire responses from firms that had purchased OCTG during January 2019-June 2022.<sup>5 6 7</sup> Responding purchasers' purchases totaled approximately 60 percent of apparent U.S. consumption of OCTG in 2019 and more than that in 2021 and January-June 2022.

Twenty responding purchasers are end users (i.e., oil and gas operators or exploration and production firms), seven are distributors, one is a wholesaler, and one, \*\*\*, purchased OCTG as part of its \*\*\*. Twenty-five responding U.S. purchasers were located in Texas, two in Oklahoma, one in Colorado, and one in Wyoming. Large purchasers of OCTG include distributors \*\*\* as well as end users \*\*\*.

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<sup>5</sup> The following firms provided purchaser questionnaire responses: \*\*\*, \*\*\*.

<sup>6</sup> Of the 29 responding purchasers, 24 purchased domestic OCTG, 12 purchased imports of the subject merchandise from Argentina, 20 purchased imports of the subject merchandise from Mexico, 18 percent purchased imports of the subject merchandise from Russia, 16 purchased imports of the subject merchandise from South Korea, and 20 purchased imports of OCTG from other sources (a wide variety of countries including European, East Asian, and Middle Eastern countries). Six purchasers indicated that they did not know the source of some of their purchases. Those firms often listed their suppliers as distributors and/or producers (such as Tenaris) with production in multiple countries. In response to an additional question, 16 purchasers stated they always knew the manufacturing location of the OCTG that they purchased, seven stated that they usually did, four stated that they sometimes did, and two stated that they never did. \*\*\* stated that it is not told country of origin at the time of purchase, but often is told later. Purchasers purchased from a wide variety of suppliers, including Tenaris (19 purchasers), Vallourec (6 purchasers), and P2 Energy (5 purchasers).

<sup>7</sup> Twenty-five purchasers indicated they had marketing/pricing knowledge of domestic product, 14 of Argentinian product, 20 of Mexican product, 12 of Russian product, 18 of South Korean product, and 14 of nonsubject countries, including multiple European and East Asian countries as well as Canada and Saudi Arabia. Purchaser \*\*\*, indicated that it was not familiar with OCTG from specific countries, but provided some data for purchases by country.

Distributor purchasers sold mainly to exploration and production companies, although two sold to other distributors as well. Among the seven distributors and one wholesaler, six firms stated that they compete for sales to their customers with their own suppliers. \*\*\* stated that “almost all {OCTG} mills” sell to end users “in some capacity.”

\*\*\* indicated that it sometimes competes with inventory in the market, including mill inventory. \*\*\* described itself as a spot market supplier. Two of the seven distributors reported that they did not compete with their suppliers.

## **Impact of section 232 tariffs**

U.S. producers and importers were asked whether the measures (e.g., tariffs, quotas, etc.) on imported steel/aluminum products under section 232, or changes in the measures (such as the level, coverage, or nature of the measures), had an impact on the OCTG market in the United States, including any effects on OCTG cost, price, supply, and/or demand, since January 1, 2019. (The section 232 measures went into effect in March 2018.) The measures affected both OCTG and some of the raw materials used to produce OCTG.

Eleven U.S. producers, 21 importers, and 20 purchasers stated that the section 232 measures had effects in the U.S. OCTG market, while 1 U.S. producer, 1 importer, and 3 purchasers stated that the section 232 measures had not.<sup>8</sup> Multiple U.S. producers, importers, and purchasers described the section 232 measures as having restricted imports, leading to increased U.S. supply and prices. Those that provided more detail often described the section 232 measures as fitting into a larger picture in which there was an initial OCTG price rise when the section 232 measures began, followed by a large decrease in demand due to the COVID-19 pandemic, and then a rise in OCTG demand, OCTG prices, and raw material costs that began in late 2021.

\*\*\* stated that the initial impact of the section 232 measures was to increase prices and spur announced domestic production increases. However, a price decrease that began in late 2018, followed by the COVID-19 pandemic, led to these planned increases being cancelled. With capacity thus restrained, when hot-rolled coil (a raw material; see Part V) costs increased in 2020 and 2021 as demand increased, OCTG prices rose dramatically. Importer \*\*\* described importers as continuing their shipments to the U.S. market, but at lower profit margins. U.S. producer \*\*\* stated that the section 232 measures, along with recovery from the COVID-19

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<sup>8</sup> Two U.S. producers, three importers, and six purchasers stated that they did not know. For example, U.S. producer \*\*\* noted that the overlapping impact of the COVID-19 pandemic made it difficult to assess the impact of the section 232 measures.

pandemic, supply chain issues, and labor availability had hampered U.S. producers' ability to ramp up production.

Additionally, U.S. producer \*\*\* described the section 232 measures as controlling the supply of imported OCTG, but also leading to increased hot-rolled coil costs (as the measures applied to various steel products). U.S. producer \*\*\* described the section 232 measures as initially controlling imports but noted that steel prices then fell in 2019. It added that OCTG prices rose in late 2021 and 2022 due a temporary supply imbalance coming from the economic recovery from the COVID-19 pandemic. Importer \*\*\* described similar trends, and stated that when OCTG demand began recovering, oil and gas drillers relied on imports to complete their projects. Importers \*\*\* described OCTG prices as initially increasing due to the section 232 measures, but then decreasing as demand decreased, with \*\*\* adding that the section 232 measures had contributed to the current demand-driven market that has “no regard for raw material cost.” Importer \*\*\* described the section 232 measures as having increased steel raw material costs. Importer \*\*\* described the section 232 measures as coinciding with increased U.S. market share for U.S. producers but added that increased hot-rolled coil production consolidation had led to shortages for this raw material.

Among purchasers, \*\*\* described OCTG prices as rising 15-20 percent over the year after the announcement of the section 232 measures (in 2018). \*\*\* described domestic mills as not increasing capacity after the measures began but added that Tenaris USA had been increasing U.S. capacity. Multiple purchasers also described limited availability of OCTG from specific countries (such as Japan and South Korea) due to the section 232 measures. \*\*\* stated that when the section 232 measures were removed for Canada and Mexico, pricing began to decrease a little.

## **Channels of distribution**

Table II-1 presents channels of distribution for OCTG in the U.S. market, by share and by quantity. U.S. mills and non-toll processors sold OCTG mainly to distributors. Although mill sales to end users increased during 2019-21, \*\*\*. Importers of \*\*\* OCTG likewise sold OCTG predominantly to distributors. However, the \*\*\*, sold OCTG \*\*\* to end users.

Tenaris stated that it supplies OCTG through its trademarked RigDirect program, through which it also provides services such as technical advice and just-in-time supply.<sup>9</sup> U.S. producer U.S. Steel and U.S. distributor P2 Energy described themselves as providing similar services.<sup>10</sup>

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<sup>9</sup> Tenaris's prehearing brief, pp. 10-11.

<sup>10</sup> Hearing transcript, pp. 24 (Beltz), 88 (Mendenhall).



**Table II-1**  
**OCTG: Share of U.S. shipments by source, channel of distribution, and period**

Shares in percent

| Source                             | Channel      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------------------|--------------|------|------|------|--------------|--------------|
| United States- Mills               | Distributor  | ***  | ***  | ***  | ***          | ***          |
| United States- Mills               | Processor    | ***  | ***  | ***  | ***          | ***          |
| United States- Mills               | End user     | ***  | ***  | ***  | ***          | ***          |
| United States- Non-toll processors | Distributor  | ***  | ***  | ***  | ***          | ***          |
| United States- Non-toll processors | Processor    | ***  | ***  | ***  | ***          | ***          |
| United States- Non-toll processors | End user     | ***  | ***  | ***  | ***          | ***          |
| Argentina                          | Distributor  | ***  | ***  | ***  | ***          | ***          |
| Argentina                          | Processor    | ***  | ***  | ***  | ***          | ***          |
| Argentina                          | End user     | ***  | ***  | ***  | ***          | ***          |
| Mexico                             | Distributor  | ***  | ***  | ***  | ***          | ***          |
| Mexico                             | Processor    | ***  | ***  | ***  | ***          | ***          |
| Mexico                             | End user     | ***  | ***  | ***  | ***          | ***          |
| Russia                             | Distributor  | ***  | ***  | ***  | ***          | ***          |
| Russia                             | Processor    | ***  | ***  | ***  | ***          | ***          |
| Russia                             | End user     | ***  | ***  | ***  | ***          | ***          |
| South Korea, subject               | Distributors | ***  | ***  | ***  | ***          | ***          |
| South Korea, subject               | Processors   | ***  | ***  | ***  | ***          | ***          |
| South Korea, subject               | End users    | ***  | ***  | ***  | ***          | ***          |
| Subject                            | Distributors | ***  | ***  | ***  | ***          | ***          |
| Subject                            | Processors   | ***  | ***  | ***  | ***          | ***          |
| Subject                            | End users    | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject            | Distributors | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject            | Processors   | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject            | End users    | ***  | ***  | ***  | ***          | ***          |
| All other nonsubject sources       | Distributors | ***  | ***  | ***  | ***          | ***          |
| All other nonsubject sources       | Processors   | ***  | ***  | ***  | ***          | ***          |
| All other nonsubject sources       | End users    | ***  | ***  | ***  | ***          | ***          |
| Nonsubject                         | Distributors | ***  | ***  | ***  | ***          | ***          |
| Nonsubject                         | Processors   | ***  | ***  | ***  | ***          | ***          |
| Nonsubject                         | End users    | ***  | ***  | ***  | ***          | ***          |
| All imports                        | Distributors | ***  | ***  | ***  | ***          | ***          |
| All imports                        | Processors   | ***  | ***  | ***  | ***          | ***          |
| All imports                        | End users    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table II-1-Continued**  
**OCTG: Share of U.S. shipments by source, channel of distribution, and period**

Quantity in short tons

| Source                             | Channel      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------------------|--------------|------|------|------|--------------|--------------|
| United States- Mills               | Distributor  | ***  | ***  | ***  | ***          | ***          |
| United States- Mills               | Processor    | ***  | ***  | ***  | ***          | ***          |
| United States- Mills               | End user     | ***  | ***  | ***  | ***          | ***          |
| United States- Non-toll processors | Distributor  | ***  | ***  | ***  | ***          | ***          |
| United States- Non-toll processors | Processor    | ***  | ***  | ***  | ***          | ***          |
| United States- Non-toll processors | End user     | ***  | ***  | ***  | ***          | ***          |
| Argentina                          | Distributor  | ***  | ***  | ***  | ***          | ***          |
| Argentina                          | Processor    | ***  | ***  | ***  | ***          | ***          |
| Argentina                          | End user     | ***  | ***  | ***  | ***          | ***          |
| Mexico                             | Distributor  | ***  | ***  | ***  | ***          | ***          |
| Mexico                             | Processor    | ***  | ***  | ***  | ***          | ***          |
| Mexico                             | End user     | ***  | ***  | ***  | ***          | ***          |
| Russia                             | Distributor  | ***  | ***  | ***  | ***          | ***          |
| Russia                             | Processor    | ***  | ***  | ***  | ***          | ***          |
| Russia                             | End user     | ***  | ***  | ***  | ***          | ***          |
| South Korea, subject               | Distributors | ***  | ***  | ***  | ***          | ***          |
| South Korea, subject               | Processors   | ***  | ***  | ***  | ***          | ***          |
| South Korea, subject               | End users    | ***  | ***  | ***  | ***          | ***          |
| Subject                            | Distributors | ***  | ***  | ***  | ***          | ***          |
| Subject                            | Processors   | ***  | ***  | ***  | ***          | ***          |
| Subject                            | End users    | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject            | Distributors | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject            | Processors   | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject            | End users    | ***  | ***  | ***  | ***          | ***          |
| All other nonsubject sources       | Distributors | ***  | ***  | ***  | ***          | ***          |
| All other nonsubject sources       | Processors   | ***  | ***  | ***  | ***          | ***          |
| All other nonsubject sources       | End users    | ***  | ***  | ***  | ***          | ***          |
| Nonsubject                         | Distributors | ***  | ***  | ***  | ***          | ***          |
| Nonsubject                         | Processors   | ***  | ***  | ***  | ***          | ***          |
| Nonsubject                         | End users    | ***  | ***  | ***  | ***          | ***          |
| All imports                        | Distributors | ***  | ***  | ***  | ***          | ***          |
| All imports                        | Processors   | ***  | ***  | ***  | ***          | ***          |
| All imports                        | End users    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

## Geographic distribution

The top states for drilling for oil and natural gas are Texas, New Mexico, and Oklahoma, and most OCTG consumed in the United States is used in the Central Southwest and Mountain regions.<sup>11</sup>

As shown in table II-2, every responding producer and every responding importer reported selling OCTG in the Central Southwest. Specifically, U.S. producers reported selling OCTG to all regions in the contiguous United States, as did \*\*\*. Importers of product from Russia reported mostly selling to the Central Southwest. Importers of product from South Korea also reported mostly selling to the Central Southwest, but some also had sales in other regions.

For U.S. producers, 26.5 percent of sales were within 100 miles of their production facility, 51.8 percent were between 101 and 1,000 miles, and 21.7 percent were over 1,000 miles. Importers sold 58.2 percent within 100 miles of their U.S. point of shipment, 30.9 percent between 101 and 1,000 miles, and 10.9 percent over 1,000 miles.

**Table II-2**  
**OCTG: Count of U.S. producers' and U.S. importers' geographic markets**

| Region                     | U.S. mills | Argentina | Mexico | Russia | South Korea (subject) | Subject sources |
|----------------------------|------------|-----------|--------|--------|-----------------------|-----------------|
| Northeast                  | 9          | ***       | ***    | 0      | ***                   | ***             |
| Midwest                    | 11         | ***       | ***    | 0      | ***                   | ***             |
| Southeast                  | 8          | ***       | ***    | 0      | ***                   | ***             |
| Central Southwest          | 14         | ***       | ***    | 6      | ***                   | ***             |
| Mountain                   | 10         | ***       | ***    | 1      | ***                   | ***             |
| Pacific Coast              | 5          | ***       | ***    | 0      | ***                   | ***             |
| Other                      | 4          | ***       | ***    | 0      | ***                   | ***             |
| All regions (except Other) | 5          | ***       | ***    | 0      | ***                   | ***             |
| Reporting firms            | 14         | 1         | 2      | 6      | ***                   | ***             |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other U.S. markets include AK, HI, PR, and VI.

Note: \*\*\*.

<sup>11</sup> See <https://www.eia.gov/energyexplained/oil-and-petroleum-products/where-our-oil-comes-from.php>, downloaded August 19, 2022, and [https://www.energy.gov/sites/prod/files/2014/02/f8/HS\\_NatGas\\_Studyguide\\_draft2.pdf](https://www.energy.gov/sites/prod/files/2014/02/f8/HS_NatGas_Studyguide_draft2.pdf), downloaded August 19, 2022.

## Supply and demand considerations

### U.S. supply

Table II-3 provides a summary of the supply factors regarding OCTG from U.S. producers and from subject countries. Capacity utilization in the United States and subject countries showed mixed trends from 2019 to 2021, a period of fluctuation in oil and gas exploration and production.

Parties provided information in the staff conference regarding OCTG production capacity. Petitioners characterized a capacity utilization rate 80 to 90 percent as a high level that would require running three shifts.<sup>12</sup> Respondents reported that capacity utilization rates of 85 percent were healthy but rates should not exceed 95 percent.<sup>13</sup>

**Table II-3**  
**OCTG: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in short tons; ratio and share in percent

| Factor  | Measure  | United States | Argentina | Mexico | Russia | South Korea (subject) |
|---|----------|---------------|-----------|--------|--------|-----------------------|
| Capacity 2019                                       | Quantity | 6,779,396     | ***       | ***    | ***    | ***                   |
| Capacity 2021                                       | Quantity | 6,615,136     | ***       | ***    | ***    | ***                   |
| Capacity utilization 2019                           | Ratio    | 44.6          | ***       | ***    | ***    | ***                   |
| Capacity utilization 2021                           | Ratio    | 27.6          | ***       | ***    | ***    | ***                   |
| Inventories to total shipments 2019                 | Ratio    | ***           | ***       | ***    | ***    | ***                   |
| Inventories to total shipments 2021                 | Ratio    | ***           | ***       | ***    | ***    | ***                   |
| Home market shipments 2021                          | Share    | ***           | ***       | ***    | ***    | ***                   |
| Non-US export market shipments 2021                 | Share    | ***           | ***       | ***    | ***    | ***                   |
| Ability to shift production (firms reporting "yes") | Count    | 11 of 17      | ***       | ***    | ***    | ***                   |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Responding U.S. producers accounted for the large majority of U.S. production of OCTG in 2021. Responding foreign producer/exporter firms accounted for an estimated \*\*\* of OCTG during 2021. For additional data on the number of responding firms and their share of U.S. production, please refer to Part I, "Summary Data and Data Sources."

<sup>12</sup> Conference transcript p. 83 (Hart).

<sup>13</sup> Conference transcript p. 191 (Cura).

### **Domestic production**

Based on available information, U.S. producers of OCTG have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of U.S.-produced OCTG to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of large amounts of unused capacity, moderate inventory levels, and the ability to shift production from producing other products to OCTG. The limited ability to divert shipments from other markets mitigates the responsiveness of supply.

Beyond the data in table II-3, many U.S. purchasers reported difficulties in obtaining as much OCTG as they wanted from U.S. mills in 2021 and the first half of 2022, as discussed further below. Some U.S. mills themselves also described difficulties meeting all orders. These difficulties may indicate that, despite low reported capacity utilization, other bottlenecks to production remain, also mitigating potential supply responses.

### **Subject imports from Argentina**

Based on available information, the responding producer of OCTG from Argentina has the ability to respond to changes in demand with large changes in the quantity of shipments of OCTG to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity, moderate inventory levels and the ability to divert shipments from other markets. The limited ability to shift production to or from alternate products mitigates the responsiveness of supply.

### **Subject imports from Mexico**

Based on available information, the responding producer of OCTG from Mexico has the ability to respond to changes in demand with large changes in the quantity of shipments of OCTG to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of some unused capacity, moderate inventory levels and the ability to divert shipments from other markets. The limited ability to shift production to or from alternate products mitigates the responsiveness of supply.

### **Subject imports from Russia**

Based on available information, producers of OCTG from Russia have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of OCTG to the U.S. market. The main contributing factors to this degree of responsiveness of

supply are the availability of some unused capacity, low inventory levels, and the ability to divert limited shipments from other markets.

During 2022, the United States has added several barriers to imports of Russian OCTG, including withdrawing most-favored-nation status, increasing duties on most products (including OCTG) from Russia, and prohibiting Russian-affiliated vessels from entering U.S. ports. Additionally, the American Petroleum Institute no longer offers certification to Russian-origin OCTG.<sup>14</sup>

### **Subject imports from South Korea**

\*\*\* responded to the Commission questionnaires. Based on the limited available information, these producers of OCTG from South Korea have the ability to respond to changes in demand with large changes in the quantity of shipments of OCTG to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity.

### **Imports from nonsubject sources**

Nonsubject imports accounted for \*\*\* percent of total U.S. imports of OCTG in 2021.<sup>15</sup> The largest sources of nonsubject imports of OCTG during January 2019-June 2022 included Austria, Canada, \*\*\*, and Taiwan.<sup>16</sup>

### **Supply constraints**

#### ***U.S. producers***

Eight U.S. producers reported that they had been unable to supply OCTG since January 1, 2019, while six stated that they had not experienced any supply constraints. Four U.S. producers described their supply as constrained after the filing of the petition in these investigations on October 6, 2021, while nine stated that it was not.

U.S. producer \*\*\* stated that it has been on controlled order entry due to demand exceeding capacity in 2022. U.S. producer \*\*\* stated that OCTG supply tends to overshoot demand signals, and production hours/capacity are removed when demand is low. It

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<sup>14</sup> See TMK's prehearing brief, pp. 5-10. See Part VII for additional information.

<sup>15</sup> In January-June 2022, imports from nonsubject countries accounted for \*\*\* percent of total U.S. imports. See Part IV for more information on imports from nonsubject countries.

<sup>16</sup> The leading nonsubject sources of welded OCTG were Canada, \*\*\*, and Taiwan. The leading nonsubject sources of seamless OCTG were Austria, Saudi Arabia, Thailand, and Ukraine.

continued that, when demand recovers, it can take weeks or months to recover capacity which can present temporary supply constraints for producers. It described this process as a function of industry planning and forecasting shortcomings rather than systematic under-capacity. U.S. producer \*\*\* stated that, due to the surges of subject imports, it was forced to \*\*\*. It continued that, only with historically high commodity and gasoline prices and the imposition of preliminary duties on subject imports has it been able to add shifts and end our curtailment. It concluded that it is currently \*\*\*. U.S. producer \*\*\* stated that it has been ramping up its domestic production to meet customer needs since market recovery began at the end of 2020. It continued that the pace of the industrial ramp-up and ability to increase OCTG production has been constrained by the availability of new hires (and associated training). It concluded that, due to these constraints, \*\*\* was unable to accept some new customers and also was unable to meet timely shipment commitments on certain occasions. U.S. producer \*\*\* stated that it was unable to supply OCTG at times because of a lack of availability of raw materials (specifically, tubing from Russia in the last 12 months), and \*\*\* stated that some orders were shipped late or pushed out further in its production schedule. U.S. producer \*\*\* reported adding additional labor as demand increased. U.S. producer \*\*\* stated that increased costs of hot-rolled coil had increased the costs of welded OCTG relative to seamless OCTG.

### ***Importers***

Fourteen importers reported that they had not experienced supply constraints since January 1, 2019, while 11 stated that they had. Nine importers specifically reported that they had experienced supply constraints since October 6, 2021.

Importers \*\*\* repeated the comments on supply constraints they made as U.S. producers (above). Importer \*\*\* reported constraints due to a lack of availability of hot-rolled coil in the first half of 2021. Importer \*\*\* described supply constraints as including the section 232 measures as well as labor and supply chain issues that began in 2020 and have continued since. Importer \*\*\* stated that starting in late fourth quarter of 2021, it placed its customers on allocation and stopped accepting orders from new customers. It elaborated that OCTG supply chains had been disrupted due to the COVID-19 pandemic. It continued that, as the economy began to emerge from the COVID-19 pandemic and demand for oil rose, demand for OCTG increased,

depleting inventories of OCTG in 2020 and 2021. It described the OCTG market as currently undersupplied but expected the market to reach equilibrium in the fourth quarter of 2022. It added that supply constraints were due to the COVID-19 pandemic and not the preliminary duties in these investigations. Importer \*\*\* stated that in 2022, its OCTG supplier is fully booked with U.S. and international orders and cannot supply more than \*\*\* current allocation. Other importers describing constraints listed the section 232 measures, the COVID-19 pandemic, and increased domestic demand as constraining supply. Importers \*\*\* indicated that they had stopped importing Russian OCTG after the launch of these investigations, and \*\*\* described Russian OCTG as having a small but critical share of the U.S. market. Importer \*\*\* also stated that it had ceased importing subject OCTG since the preliminary duties began.

### ***Purchasers***

Purchasers were also asked about whether they had experienced OCTG supply shortages both before and after the petitions were filed. First, purchasers were asked if any firm had refused, declined, or been unable to supply their firm with OCTG between January 1, 2019 and October 5, 2021. Eighteen of 28 responding purchasers stated that at least one firm had, naming suppliers including \*\*\*. For example, \*\*\* stated that it had been put on allocation from almost all of its suppliers, including \*\*\*. It added that these were “just a few of the many examples. Capacity at all of these mills has been greatly reduced and in most cases has yet to be fully restored.” Similarly, \*\*\* explained that U.S. mills reduced their capacity in 2020 and have had difficulty restoring that capacity due to shortages of labor and raw materials. \*\*\* reported that lead times from \*\*\* for \*\*\* had extended to 150-240 days. Distributor \*\*\* indicated that it had been put on allocation over the last 12-18 months at multiple suppliers, resulting in \*\*\* in turn losing new customers. \*\*\* reported shortages that it attributed to the COVID-19 pandemic and the section 232 measures.

Purchasers were also asked if any firm had refused, declined, or been unable to supply their firm with OCTG after October 5, 2021 (the date of the petition in these investigations). Twenty-six of 27 responding purchasers stated that at least one firm had. \*\*\* stated that in 2021 and 2022, it had difficulty securing supply from \*\*\*, so it reached out to \*\*\*, which was also unable to supply. It added that in 2022, it had reached out to \*\*\* and encountered similar issues. Other purchasers often described the preliminary duties as



going into effect coincident with other issues, such as preexisting supply tightness, the Russian-Ukraine war, and/or rising raw material costs. \*\*\* stated that it had been unable to add rigs because it cannot confirm when additional OCTG would be available and at what cost. It added that \*\*\*. Other purchasers described longer lead times and shortages that also curtailed their own drilling activity. \*\*\* characterized the problem as occurring “globally” because of global supply chain difficulties.

Purchasers were also asked if the availability of OCTG from U.S., subject, and nonsubject sources had changed since January 1, 2019. Twenty-seven of 29 responding purchasers reported that the availability of U.S. OCTG had changed. \*\*\* described the U.S. market for OCTG as being oversupplied in 2020, as demand fell relative to 2019. This oversupply led to many U.S. producers curtailing or even shuttering production. When demand improved in 2021, U.S. mills were slow to return to production, and welded OCTG producers faced very high prices for the input hot-rolled coil steel. Other purchasers (\*\*\*) described similar developments, or parts thereof. In other comments, individual purchasers cited the COVID-19 pandemic, the Russia-Ukraine war, and the section 232 measures as affecting the availability of U.S.-produced OCTG. \*\*\* stated that large diameter OCTG is “no longer available.”

Twenty-two of 27 responding purchasers reported that the availability of subject imports of OCTG had changed. Some of these purchasers cited the same factors as described above (e.g., the COVID-19 pandemic and the Russia-Ukraine war). Additionally, \*\*\* stated that the start of the Russia-Ukraine war had led to imports from Russia dropping to zero. \*\*\* described subject imports as having increased availability due to Tenaris’s new “Rig Direct” model (in which OCTG is sold directly to end users rather than through a distribution network). Several purchasers also described the preliminary duties in these investigations as having reduced subject imports.

Fourteen of 21 responding purchasers reported that the availability of nonsubject imports of OCTG had changed. These purchasers generally cited a decrease in the availability of nonsubject imports, for the same reasons as described above, e.g., trade measures, the COVID-19 pandemic, and the Russia-Ukraine war. \*\*\* indicated that supply from Ukraine (which it estimated as approximately 5.5 percent of the U.S. market before the war) had decreased. \*\*\* described demand as outpacing nonsubject supply.

Additionally, two purchasers described Tenaris’s acquisition of TMK as reducing U.S. capacity, and one of those (\*\*\*) added that Tenaris USA then began importing from

Argentina and Mexico. \*\*\* described U.S. Steel’s closure of its Lorain, Ohio mill as \*\*\*.

## Inventories

Inventories of OCTG are held domestically by U.S. producers, distributors, importers, and end users in the United States. Distributors will typically stock OCTG from producers and importers and try to maintain inventory levels that are neither too small (risking missed delivery time frames or lost sales) or too large (risking price fluctuations that affect the valuation of any held stock).<sup>17</sup>

Table II-4 and figure II-1 present the inventory of OCTG held by end users and distributors, in net tons, as reported by \*\*\*. After small fluctuations around \*\*\* net tons from January 2019 through March 2021, inventories began rising, reaching \*\*\* net tons in January 2022 and growing at a slower rate thereafter.<sup>18</sup>

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<sup>17</sup> *Certain Oil Country Tubular Goods from India, Korea, Philippines, Saudi Arabia, Taiwan, Thailand, Turkey, Ukraine, and Vietnam, Investigations Nos. 731-TA-1215-1223 (Final)*, USITC Publication 4489, September 2014, p. II-11.

<sup>18</sup> Calculating months-on-hand inventory by dividing inventories in table II-4 by operational consumption (see table II-6 below), months-on-hand inventory was \*\*\* months in January 2019, rose to \*\*\* months in August 2020, and was \*\*\* months in June 2022.

**Table II-4**

**OCTG: U.S inventory level, by month, January 2019-June 2022**

Inventory level in net tons

| <b>Year</b> | <b>Month</b> | <b>Inventory level</b> |
|-------------|--------------|------------------------|
| 2019        | January      | ***                    |
| 2019        | February     | ***                    |
| 2019        | March        | ***                    |
| 2019        | April        | ***                    |
| 2019        | May          | ***                    |
| 2019        | June         | ***                    |
| 2019        | July         | ***                    |
| 2019        | August       | ***                    |
| 2019        | September    | ***                    |
| 2019        | October      | ***                    |
| 2019        | November     | ***                    |
| 2019        | December     | ***                    |
| 2020        | January      | ***                    |
| 2020        | February     | ***                    |
| 2020        | March        | ***                    |
| 2020        | April        | ***                    |
| 2020        | May          | ***                    |
| 2020        | June         | ***                    |
| 2020        | July         | ***                    |
| 2020        | August       | ***                    |
| 2020        | September    | ***                    |
| 2020        | October      | ***                    |
| 2020        | November     | ***                    |
| 2020        | December     | ***                    |
| 2021        | January      | ***                    |
| 2021        | February     | ***                    |
| 2021        | March        | ***                    |
| 2021        | April        | ***                    |
| 2021        | May          | ***                    |
| 2021        | June         | ***                    |
| 2021        | July         | ***                    |
| 2021        | August       | ***                    |
| 2021        | September    | ***                    |
| 2021        | October      | ***                    |
| 2021        | November     | ***                    |
| 2021        | December     | ***                    |
| 2022        | January      | ***                    |
| 2022        | February     | ***                    |
| 2022        | March        | ***                    |
| 2022        | April        | ***                    |
| 2022        | May          | ***                    |
| 2022        | June         | ***                    |

Source: \*\*\*, various issues.

**Figure II-1**  
**OCTG: U.S inventory level, by month, January 2019-June 2022**

\* \* \* \* \*

**New suppliers**

Twenty-four purchasers were not aware of any new OCTG suppliers in the U.S. market since January 1, 2019. Five purchasers indicated that new suppliers had entered the U.S. market. These purchasers named Marubeni Corporation, Tex-Isle Supply, Jindal Pipe USA, SeAH Steel, Bellville Tube, AJ Steel, and Nexteel Saha Thai as new suppliers of OCTG.

**U.S. demand**

Based on available information, the overall demand for OCTG is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products and the small to moderate cost share of OCTG in oil and gas drilling (its ultimate end use), although different well designs can mitigate some OCTG shortages, and drilling can be postponed.

**End uses and cost share**

U.S. demand for OCTG depends on the demand from the energy sector, specifically oil exploration and production. OCTG accounts for a small-to-moderate share of the cost of drilling an oil or gas well. U.S. producers, importers, and purchasers generally reported that OCTG accounted for between 3 and 25 percent of the cost of an oil rig or oil and gas well. \*\*\*

provided data that OCTG was a lower share of onshore drilling rigs than Gulf of Mexico rigs, and \*\*\* provided separate data for oil wells versus gas wells, showing that OCTG accounted for \*\*\* percent of each. Other firms often described the end use as a combined “oil and gas” wells.

### **Demand determinants**

Demand for OCTG is driven by oil and gas exploration and production, which has seen dramatic swings since January 2019. Over the course of 2019, OCTG demand declined due to a dispute over oil prices and production between Saudi Arabia and Russia.<sup>19</sup> Then, at the onset of the COVID-19 pandemic in early 2020, oil and gas production plummeted as oil prices even briefly turned negative. (See appendix E for more information on oil and natural gas prices.) However, multiple factors (including rising inflation and U.S. sanctions due to the Russian-Ukraine war) led to rising oil and natural gas prices in late 2021 and early 2022, in turn leading to more oil and gas exploration and production.

Oil and gas production is measured by the number of feet drilled. While the number of feet drilled varies between rigs such as the well type (vertical, horizontal, or directional), and the region where the well is being drilled, the active rig count for oil and gas rigs is a standard indicator for oil and gas exploration and production and a broad indicator of the demand for OCTG. The active oil and gas rig count generally decreased from January 2019 to August 2020, when it reached historic lows.<sup>20</sup> The active rig count then began to recover through the summer of 2022 while remaining more than 25 percent below early 2019 levels (table II-5 and figure II-2).

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<sup>19</sup> Hearing transcript p. 94 (Schagrin) and p. 165 (Prusa).

<sup>20</sup> Reuters, <https://www.reuters.com/article/us-usa-rigs-baker-hughes/u-s-drillers-cut-oil-gas-rigs-to-historic-low-baker-hughes-idUSKBN22K0IL> (accessed November 2, 2021).

**Table II-5****Rig count: Baker Hughes U.S. oil and gas rig count, by month, January 2019- September 22, 2022**

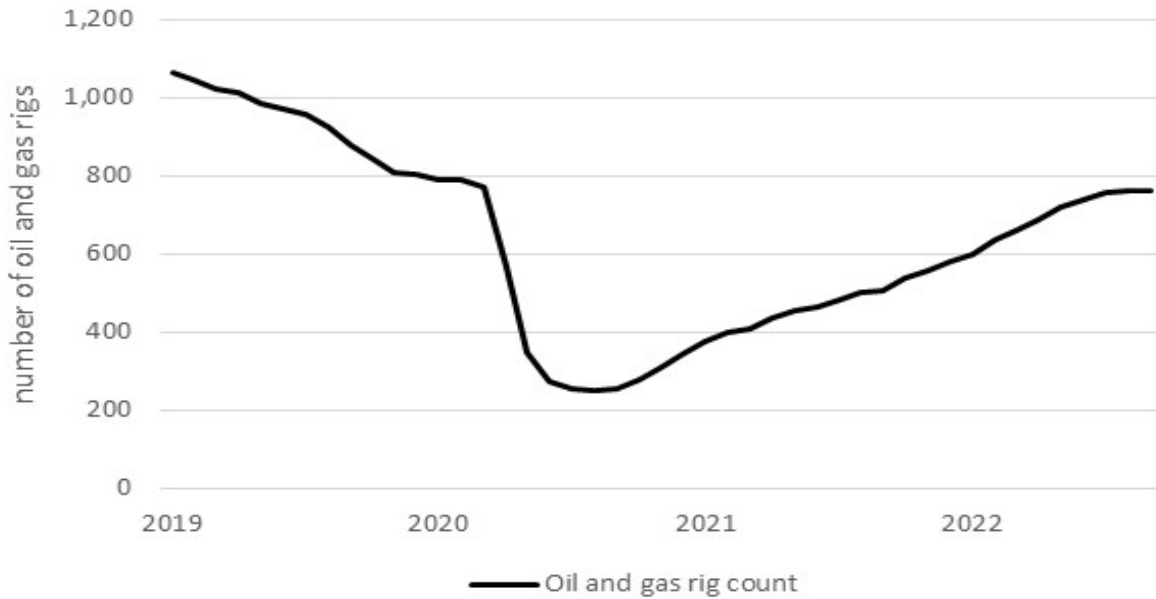
Count in number of oil and gas rigs

| Year | Month     | Oil and gas combined rig count |
|------|-----------|--------------------------------|
| 2019 | January   | 1,065                          |
| 2019 | February  | 1,048                          |
| 2019 | March     | 1,023                          |
| 2019 | April     | 1,013                          |
| 2019 | May       | 986                            |
| 2019 | June      | 970                            |
| 2019 | July      | 955                            |
| 2019 | August    | 926                            |
| 2019 | September | 878                            |
| 2019 | October   | 848                            |
| 2019 | November  | 810                            |
| 2019 | December  | 804                            |
| 2020 | January   | 791                            |
| 2020 | February  | 790                            |
| 2020 | March     | 771                            |
| 2020 | April     | 565                            |
| 2020 | May       | 348                            |
| 2020 | June      | 274                            |
| 2020 | July      | 255                            |
| 2020 | August    | 250                            |
| 2020 | September | 257                            |
| 2020 | October   | 280                            |
| 2020 | November  | 311                            |
| 2020 | December  | 341                            |
| 2021 | January   | 374                            |
| 2021 | February  | 397                            |
| 2021 | March     | 408                            |
| 2021 | April     | 436                            |
| 2021 | May       | 453                            |
| 2021 | June      | 464                            |
| 2021 | July      | 483                            |
| 2021 | August    | 501                            |
| 2021 | September | 508                            |
| 2021 | October   | 538                            |
| 2021 | November  | 560                            |
| 2021 | December  | 579                            |
| 2022 | January   | 601                            |
| 2022 | February  | 636                            |
| 2022 | March     | 662                            |
| 2022 | April     | 690                            |
| 2022 | May       | 719                            |
| 2022 | June      | 738                            |
| 2022 | July      | 757                            |
| 2022 | August    | 764                            |
| 2022 | September | 762                            |

Source: Baker-Hughes North America Rotary Rig Count, <https://rigcount.bakerhughes.com/na-rig-count>, accessed July 19, 2022 and September 22, 2022.

**Figure II-2**

**Rig count: Baker Hughes U.S. oil and gas rig count, by month, January 2019- September 2022**



Source: Baker-Hughes North America Rotary Rig Count, <https://rigcount.bakerhughes.com/na-rig-count>, accessed July 19, 2022 and September 26, 2022.

Operational consumption, a measure of tonnage of OCTG used, is another common indicator of demand for OCTG. Operational consumption generally decreased from January 2019 to August 2020. Operational consumption then began to recover through June 2022 while remaining below first half 2019 levels (table II-6).

**Table II-6**  
**OCTG: Operational consumption, January 2019- June 2022**

Operational consumption in net tons

| <b>Year</b> | <b>Month</b> | <b>Operational consumption</b> |
|-------------|--------------|--------------------------------|
| 2019        | January      | ***                            |
| 2019        | February     | ***                            |
| 2019        | March        | ***                            |
| 2019        | April        | ***                            |
| 2019        | May          | ***                            |
| 2019        | June         | ***                            |
| 2019        | July         | ***                            |
| 2019        | August       | ***                            |
| 2019        | September    | ***                            |
| 2019        | October      | ***                            |
| 2019        | November     | ***                            |
| 2019        | December     | ***                            |
| 2020        | January      | ***                            |
| 2020        | February     | ***                            |
| 2020        | March        | ***                            |
| 2020        | April        | ***                            |
| 2020        | May          | ***                            |
| 2020        | June         | ***                            |
| 2020        | July         | ***                            |
| 2020        | August       | ***                            |
| 2020        | September    | ***                            |
| 2020        | October      | ***                            |
| 2020        | November     | ***                            |
| 2020        | December     | ***                            |
| 2021        | January      | ***                            |
| 2021        | February     | ***                            |
| 2021        | March        | ***                            |
| 2021        | April        | ***                            |
| 2021        | May          | ***                            |
| 2021        | June         | ***                            |
| 2021        | July         | ***                            |
| 2021        | August       | ***                            |
| 2021        | September    | ***                            |
| 2021        | October      | ***                            |
| 2021        | November     | ***                            |
| 2021        | December     | ***                            |
| 2022        | January      | ***                            |
| 2022        | February     | ***                            |
| 2022        | March        | ***                            |
| 2022        | April        | ***                            |
| 2022        | May          | ***                            |
| 2022        | June         | ***                            |

Source: \*\*\*, various issues.



The type of wells drilled also impacts the demand for OCTG. Horizontal wells on average require a greater number of feet of OCTG than vertical and directional wells. The percentage of horizontal wells relative to vertical and directional wells has increased since 2000 and continued to increase during 2019-21. As a result, the average footage per well has also increased.<sup>21</sup> Rigs drilling horizontal wells as a percentage of all rigs has increased from 2019 to 2021 (table II-7).

**Table II-7**  
**OCTG: Share of active rigs by well type and period**

Shares in percent

| Year                   | Horizontal | Vertical | Other |
|------------------------|------------|----------|-------|
| 2019                   | 87.5       | 5.7      | 6.7   |
| 2020                   | 88.1       | 4.9      | 7.0   |
| 2021                   | 90.3       | 4.6      | 5.1   |
| 2022 through October 7 | 91.1       | 3.7      | 5.2   |

Source: Baker-Hughes North America Rotary Rig Count, <https://rigcount.bakerhughes.com/na-rig-count>, accessed July 20, 2022 and October 13, 2022.

### Business cycles

Eleven U.S. producers, 17 importers, and 28 purchasers indicated that the U.S. OCTG market was subject to business cycles or unique conditions of competition. However, three U.S. producers, eight importers, and one purchaser stated that it was not.

Nine U.S. producers, 9 importers, and 21 purchasers described the OCTG market as subject to business cycles. These firms described the OCTG business cycle as dependent upon the oil and gas business cycle (as reflected in the prices of oil and gas as well as the rig count, the general commodity cycle (affecting raw materials costs such as those of iron and coke), and the general industrial demand cycle. U.S. producer \*\*\* described the oil and gas cycle as generally lasting two to three years. Additionally, \*\*\* described demand as typically lower at the end of the year when purchasers have exhausted their budgets.

Eight U.S. producers, 13 importers, and 15 purchasers described the OCTG market as subject to other business cycles, generally listing cycles in the oil and gas market as a major influence on OCTG demand. Other factors listed included imports of OCTG from countries that do not do much oil and gas drilling (such as China and South Korea), raw material costs (such as steel and scrap costs), demand trends for proprietary grades of OCTG, new suppliers, and the COVID-19 pandemic. \*\*\* described OCTG

<sup>21</sup> EIA, <https://www.eia.gov/todayinenergy/detail.php?id=44236> (accessed November 2, 2021)

supply as frequently overshooting demand, leading to “erratic pricing.” Purchaser \*\*\* also listed labor costs as a relevant business cycle.

Eight U.S. producers, 16 importers, and 27 purchasers stated that the business cycles and/or conditions of competition for OCTG had changed since January 1, 2019. Four U.S. producers, two importers, and two purchasers stated that it had not. Firms listed changes such as oil and gas market fluctuations, the COVID-19 pandemic (which led to lower OCTG demand and then a supply glut, followed by OCTG demand recovery), the section 232 measures, geopolitical events, and commodity cost increases (such as for hot-rolled coil). \*\*\* summarized the changes by noting that the global market for hydrocarbons hit record lows in April 2020 before reaching 14-year highs in the first half of 2022. Similarly, purchaser \*\*\* described 2020 as a “very tough” year for the oil and gas industry, resulting in reduced activity, layoffs, and substantial cuts to capital expenditures. When activity rebounded in 2021, it did so at such a fast pace that OCTG suppliers could not meet orders without much higher OCTG prices, in turn reducing oilfield activity. Purchaser \*\*\* described these demand swings as “whiplash,” and \*\*\* described them as “drastic.”<sup>22</sup>

### Demand trends

Most U.S. producers and importers reported decreasing or fluctuating U.S. demand for OCTG since January 1, 2019, while most purchasers reported increasing or fluctuating U.S. demand (table II-8).

**Table II-8**  
**OCTG: Count of firms’ responses regarding overall domestic and foreign demand, by firm type**

| Market                      | Firm type      | Increase | No change | Decrease | Fluctuate |
|-----------------------------|----------------|----------|-----------|----------|-----------|
| Domestic demand             | U.S. producers | 3        | 1         | 6        | 4         |
| Domestic demand             | Importers      | 5        | 0         | 9        | 11        |
| Domestic demand             | Purchasers     | 18       | 0         | 2        | 9         |
| Foreign demand              | U.S. producers | 0        | 1         | 2        | 2         |
| Foreign demand              | Importers      | 2        | 1         | 7        | 7         |
| Foreign demand              | Purchasers     | 10       | 0         | 0        | 7         |
| Demand for end use products | Purchasers     | 8        | 2         | 0        | 9         |

Source: Compiled from data submitted in response to Commission questionnaires.

Most U.S. producers and importers described U.S. OCTG demand trends as based on oil and gas drilling activity, and specifically reduced oil and gas drilling due to the COVID-19

<sup>22</sup> Many other firms had similar descriptions of the demand swings during January 2019-June 2020.

pandemic. They also described OCTG demand as recovering in 2021 and 2022. \*\*\* described a long-term trend of oil and gas drillers figuring out how to improve well output using less OCTG. \*\*\* described the current Russia-Ukraine conflict, along with demand recovery, as leading to OCTG demand outstripping supply. \*\*\* stated that OCTG demand declines in 2020 also stemmed from an oil price “war” between Russia and Saudi Arabia.

Most responding purchasers reported similar trends in OCTG demand, i.e., decreased demand in 2020 during the COVID-19 pandemic, followed by increased demand in 2021, rising further in early 2022 with the Russia-Ukraine war and increased oil and gas prices. \*\*\* added that current demand for U.S. oil and gas is even higher due to some countries putting sanctions on Russian oil and gas and due to the Biden Administration’s public request to U.S. oil and gas producers to keep gasoline prices low. \*\*\* noted that while OCTG consumption is not quite back to 2019 levels, prices are much higher, possibly indicating that demand is higher (while supply is more restricted due to mill closures). Purchasers often used colorful language in describing recent demand changes in OCTG, using phrases such as “massive decrease,” “major swing,” “rebounded dramatically,” and “extremely volatile.”

Regarding demand in other countries, most responding firms described similar trends as described above for the U.S. market. \*\*\* described multiple oil and gas producing countries as increasing production in response to higher energy prices, in turn due to the Russia-Ukraine war. It added that this increased global production was reducing the availability of OCTG worldwide. \*\*\* stated that while demand had risen in 2022, it was still not back at January 2019 levels.

Purchasers were also asked to describe trends in demand for the final product (in this case, oil and gas) produced with the OCTG that they purchase. Nine purchasers described end use demand as having fluctuated, eight described it as having increased, and two described it as unchanged since January 1, 2019. Seventeen of 19 purchasers described this end use demand as having affected their demand for OCTG. These purchasers described their OCTG demand as based on drilling activity, which in turn is based on oil and gas prices. \*\*\* described oil and gas projects as facing “chronic underinvestment” since 2014, but now facing increased demand. Other purchasers described increased oil and gas demand due to economic recovery since the COVID-19 pandemic, the Russia-Ukraine war, and/or oil and gas projects at specific firms.

## **Substitute products**

Fourteen U.S. producers, 22 importers, and 28 purchasers indicated that there are no substitutes for OCTG.

## **Substitutability issues**

This section will assess the degree to which U.S.-produced OCTG and imports of OCTG from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of OCTG from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced OCTG and OCTG imported from subject sources.<sup>23</sup> Factors contributing to this level of substitutability include a high degree of interchangeability between U.S. and imported OCTG and the high level of comparability in many purchasing factors. Factors mitigating substitutability include varying availability of OCTG from some sources including some specific OCTG products that some purchasers stated were not supplied by U.S. producers. Purchasers also sometimes described factors other than price (including physical characteristics such as size and heat treatment) as playing a role in purchasing decisions.

## **Factors affecting purchasing decisions**

### **Purchaser decisions based on source**

As shown in table II-9, purchasers had a variety of responses when asked if they make decisions based on the producer of OCTG. However, 24 purchasers indicated that they only sometimes or never make decisions based on the country of origin of the OCTG. Purchasers described price, quality, availability, technical specifications, and reputation as a reason to purchase from a specific producer and/or country.

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<sup>23</sup> The degree of substitution between domestic and imported OCTG depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced OCTG to the OCTG imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

**Table II-9**

**OCTG: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin**

| <b>Firm making decision</b> | <b>Decision based on</b> | <b>Always</b> | <b>Usually</b> | <b>Sometimes</b> | <b>Never</b> |
|-----------------------------|--------------------------|---------------|----------------|------------------|--------------|
| Purchaser                   | Producer                 | 9             | 8              | 8                | 4            |
| Customer                    | Producer                 | 2             | 1              | 6                | 2            |
| Purchaser                   | Country                  | 2             | 3              | 14               | 10           |
| Customer                    | Country                  | 0             | 1              | 6                | 5            |

Source: Compiled from data submitted in response to Commission questionnaires.

Seventeen purchasers indicated that they do not ever order OCTG from one country in particular over other sources of supply. Eleven indicated they did, citing trade measures, domestic preference (two purchasers), customer preference (including for domestic product), inability to obtain domestic supply, quality concerns with Chinese product, South Korean quality standards, and specific products available from Italian producers. \*\*\* stated that it had a preference for domestic material, but \*\*\*, no longer does. However, \*\*\* added that OCTG meeting the same specifications is usually fungible.

Eighteen of 27 responding purchasers indicated that some grades/types/sizes of OCTG were only available from certain country sources. Those purchasers listed sour service grades, certain larger diameter (especially heat-treated) OCTG, and chrome OCTG as more available from particular sources, especially nonsubject countries such as Germany, Italy, and Japan, than from U.S. mills. Additionally, some specifications (such as 18-inch diameter seamless OCTG from Italy, noted by two purchasers) were exclusively available from particular sources. \*\*\* specified that OCTG with diameter over 9 5/8 inches is difficult to obtain from U.S. producers due to lack of mill capacity.

**Importance of purchasing domestic product**

Twenty-two purchasers reported that 99 percent or more of their purchases did not require purchasing U.S.-produced product. Five purchasers (generally distributors) reported that some of their customers required U.S.-produced product, for between 20 and 45 percent of their purchases.

**Most important purchase factors**

The most often cited top three factors that firms consider in their purchasing decisions for OCTG were quality (20 firms), price (20 firms), and availability (18 firms) as shown in table II-10. Quality/performance was the most frequently cited first-most important factor (cited by 12 firms), followed by availability (6 firms); availability was the most frequently reported second-

most important factor (9 firms); and price/cost was the most frequently reported third-most important factor (8 firms).

**Table II-10**  
**OCTG: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor**

| Factor                                       | First | Second | Third | Total |
|--|-------|--------|-------|-------|
| Quality/performance                          | 12    | 6      | 2     | 20    |
| Price/cost                                   | 5     | 7      | 8     | 20    |
| Availability                                 | 6     | 9      | 3     | 18    |
| Technical qualifications/support/engineering | 4     | 2      | 2     | 8     |
| Reliability/traditional supplier             | 0     | 2      | 3     | 5     |
| Delivery/lead time                           | 1     | 1      | 2     | 4     |
| Range  | 0     | 0      | 3     | 3     |
| All other factors                            | 0     | 0      | 2     | 2     |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other factors include logistics, transportation costs, and warranty.

Fifteen purchasers reported that they sometimes purchase the lowest-priced product, 10 reported that they usually do, and 5 reported that they never do.

### **Importance of specified purchase factors**

Purchasers were asked to rate the importance of 15 factors in their purchasing decisions (table II-11). The factors rated as very important by at least 24 responding purchasers were availability (29 purchasers), quality meeting industry standards (28 purchasers), reliability of supply (26 purchasers), delivery time (24 purchasers), and product consistency (24 purchasers). Price (19 purchasers), technical support/service (18 purchasers), and quality exceeding industry standards (15 purchasers) were also named as very important by over half of purchasers.

**Table II-11****OCTG: Count of purchasers' responses regarding importance of purchase factors, by factor**

| <b>Factor</b>                      | <b>Very important</b> | <b>Somewhat important</b> | <b>Not important</b> |
|------------------------------------|-----------------------|---------------------------|----------------------|
| Availability                       | 29                    | 0                         | 0                    |
| Delivery terms                     | 11                    | 17                        | 1                    |
| Delivery time                      | 24                    | 3                         | 2                    |
| Discounts offered                  | 5                     | 20                        | 4                    |
| Minimum quantity requirements      | 4                     | 11                        | 12                   |
| Packaging                          | 3                     | 9                         | 15                   |
| Payment terms                      | 5                     | 14                        | 9                    |
| Price                              | 19                    | 8                         | 2                    |
| Product consistency                | 24                    | 3                         | 2                    |
| Product range                      | 9                     | 16                        | 4                    |
| Quality meets industry standards   | 28                    | 1                         | 0                    |
| Quality exceeds industry standards | 15                    | 10                        | 4                    |
| Reliability of supply              | 26                    | 3                         | 0                    |
| Technical support/service          | 18                    | 7                         | 4                    |
| U.S. transportation costs          | 7                     | 16                        | 6                    |

Source: Compiled from data submitted in response to Commission questionnaires.

**Lead times**

U.S. producers sold a majority of their OCTG produced to order, while importers sold a majority of their OCTG from inventory. U.S. producers reported that 76.0 percent of their commercial shipments were produced-to-order, with lead times averaging 69 days. The remaining 24.0 percent of their commercial shipments came from inventories, with lead times averaging 5 days. Importers reported that 67.4 percent of their commercial shipments came from inventory with lead times averaging 23 days. Importers indicated that the remaining 32.6 percent of their commercial shipments were produced-to-order, with lead times averaging 111 days.

**Supplier certification**

Sixteen responding purchasers require their suppliers to become certified or qualified to sell OCTG to their firm, and 12 did not. Most purchasers reported that the time to qualify a new supplier ranged from 30 days to 1 year. \*\*\* indicated that purchase time can vary depending on whether the product is more commodity grade or more specialized. Among purchasers, oil and gas producers often reported extensive qualification processes, especially for new suppliers. These processes involved assessing quality and supplier capabilities, as well as meeting API standards. Multiple purchasers also described supplier relationships as playing a key role in certification.

Twenty-five purchasers reported that no domestic or foreign supplier had failed in its attempt to qualify OCTG or had lost its approved status since 2019. Three reported such

failures, with \*\*\*. Two other purchasers reported failures by suppliers in Brazil and South Africa.

### Minimum quality specifications

As can be seen from table II-12, a majority of responding purchasers reported that domestically produced product, subject product, and nonsubject product always or usually met minimum quality specifications. Nonsubject sources compared included Brazil, France, Germany, Italy, Japan, and Saudi Arabia.

**Table II-12**  
**OCTG: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source**

| Source of purchases | Always | Usually | Sometimes | Rarely or never | Don't Know |
|---------------------|--------|---------|-----------|-----------------|------------|
| United States       | 14     | 11      | 1         | 1               | 1          |
| Argentina           | 11     | 8       | 0         | 0               | 8          |
| Mexico              | 12     | 11      | 0         | 0               | 5          |
| Russia              | 6      | 9       | 2         | 0               | 8          |
| South Korea         | 8      | 10      | 1         | 0               | 10         |
| Nonsubject sources  | 4      | 7       | 1         | 0               | 0          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Purchasers were asked how often domestically produced or imported OCTG meets minimum quality specifications for their own or their customers' uses.

Purchasers reported factors that determine OCTG quality. At least ten purchasers referenced meeting API specifications as a basis for quality. Others cited their own firm's inspection and the supplier's quality management system. Purchasers' definitions of quality also included consistency, metallurgical and chemical properties, supplier reputation, product failure rates, product strength, wall thickness, resistance to cracking, and length.

### Changes in purchasing patterns

Fifteen responding purchasers reported that they had changed suppliers since January 1, 2019, while 14 reported that they had not. Among those reporting changes, \*\*\* reported dropping U.S. Steel and adding \*\*\* because \*\*\*. \*\*\* reported adding Tenaris for quality, pricing, availability, and delivery reasons and because Tenaris does not require third party brokers. \*\*\* also added Tenaris because of availability and quality reasons or because Tenaris acquired previous suppliers. \*\*\* also reported \*\*\*. \*\*\* reported dropping Hyundai Steel USA



because it was \*\*\*, and it reported adding new mills as suppliers. Other reasons for changes included changes in technical specifications, pricing, lead times, and supply shortages.

Purchasers were asked about changes in their purchasing patterns from different sources since 2019 (table II-13). Purchasers reported a variety of responses for purchases of U.S. and South Korean product, mostly fluctuating purchases of Argentine product, and mostly decreasing or fluctuating purchases of Mexican and Russian product.

Reasons reported for changes in sourcing included the changes in demand discussed elsewhere in this chapter as well as availability of product. Regarding availability, firms cited the closure of U.S. Steel’s Lorain mill, the need for sour-service OCTG, and Tenaris’s acquisition of TMK and its subsequent increase in imports.

**Table II-13**  
**OCTG: Count of purchasers’ responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries**

| Source of purchases | Decreased | Increased | Constant | Fluctuated | Did not purchase |
|---------------------|-----------|-----------|----------|------------|------------------|
| United States       | 6         | 6         | 5        | 9          | 2                |
| Argentina           | 2         | 3         | 0        | 9          | 12               |
| Mexico              | 8         | 4         | 2        | 7          | 6                |
| Russia              | 8         | 3         | 0        | 6          | 8                |
| South Korea         | 3         | 5         | 4        | 7          | 6                |
| Nonsubject sources  | 2         | 7         | 5        | 6          | 4                |
| Sources unknown     | 1         | 2         | 1        | 3          | 14               |

Source: Compiled from data submitted in response to Commission questionnaires.

### **Purchase factor comparisons of domestic products, subject imports, and nonsubject imports**

Purchasers were asked a number of questions comparing OCTG produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 15 factors (tables II-14) for which they were asked to rate the importance.

Most purchasers reported that U.S., subject, and nonsubject OCTG were comparable on most factors. However, minorities of purchasers reported that U.S. product was superior to other countries’ product in availability, delivery terms, and delivery time. Similarly, minorities of purchasers indicated that U.S. product was inferior to Russian and South Korean product on price.

**Table II-14****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b> | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|---------------------|-----------------|-------------------|-----------------|
| Availability                       | US v. Argentina     | 4               | 15                | 2               |
| Delivery terms                     | US v. Argentina     | 5               | 15                | 0               |
| Delivery time                      | US v. Argentina     | 9               | 11                | 0               |
| Discounts offered                  | US v. Argentina     | 1               | 17                | 2               |
| Minimum quantity requirements      | US v. Argentina     | 1               | 19                | 0               |
| Packaging                          | US v. Argentina     | 1               | 18                | 0               |
| Payment terms                      | US v. Argentina     | 1               | 19                | 0               |
| Price                              | US v. Argentina     | 1               | 16                | 2               |
| Product consistency                | US v. Argentina     | 1               | 18                | 2               |
| Product range                      | US v. Argentina     | 1               | 18                | 2               |
| Quality meets industry standards   | US v. Argentina     | 1               | 18                | 1               |
| Quality exceeds industry standards | US v. Argentina     | 1               | 17                | 1               |
| Reliability of supply              | US v. Argentina     | 3               | 15                | 2               |
| Technical support/service          | US v. Argentina     | 2               | 16                | 3               |
| U.S. transportation costs          | US v. Argentina     | 4               | 16                | 0               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b> | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|---------------------|-----------------|-------------------|-----------------|
| Availability                       | US v. Mexico        | 4               | 17                | 4               |
| Delivery terms                     | US v. Mexico        | 4               | 20                | 0               |
| Delivery time                      | US v. Mexico        | 7               | 17                | 0               |
| Discounts offered                  | US v. Mexico        | 2               | 18                | 3               |
| Minimum quantity requirements      | US v. Mexico        | 2               | 22                | 0               |
| Packaging                          | US v. Mexico        | 2               | 21                | 0               |
| Payment terms                      | US v. Mexico        | 2               | 22                | 0               |
| Price                              | US v. Mexico        | 1               | 19                | 4               |
| Product consistency                | US v. Mexico        | 1               | 21                | 3               |
| Product range                      | US v. Mexico        | 1               | 19                | 5               |
| Quality meets industry standards   | US v. Mexico        | 1               | 22                | 1               |
| Quality exceeds industry standards | US v. Mexico        | 2               | 18                | 3               |
| Reliability of supply              | US v. Mexico        | 4               | 18                | 2               |
| Technical support/service          | US v. Mexico        | 3               | 19                | 3               |
| U.S. transportation costs          | US v. Mexico        | 3               | 21                | 0               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b> | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|---------------------|-----------------|-------------------|-----------------|
| Availability                       | US v. Russia        | 7               | 7                 | 1               |
| Delivery terms                     | US v. Russia        | 5               | 8                 | 1               |
| Delivery time                      | US v. Russia        | 7               | 6                 | 2               |
| Discounts offered                  | US v. Russia        | 1               | 9                 | 4               |
| Minimum quantity requirements      | US v. Russia        | 1               | 13                | 1               |
| Packaging                          | US v. Russia        | 1               | 11                | 2               |
| Payment terms                      | US v. Russia        | 1               | 13                | 1               |
| Price                              | US v. Russia        | 0               | 9                 | 6               |
| Product consistency                | US v. Russia        | 1               | 11                | 3               |
| Product range                      | US v. Russia        | 2               | 11                | 2               |
| Quality meets industry standards   | US v. Russia        | 1               | 13                | 1               |
| Quality exceeds industry standards | US v. Russia        | 5               | 9                 | 1               |
| Reliability of supply              | US v. Russia        | 5               | 7                 | 3               |
| Technical support/service          | US v. Russia        | 3               | 9                 | 3               |
| U.S. transportation costs          | US v. Russia        | 2               | 9                 | 4               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b> | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|---------------------|-----------------|-------------------|-----------------|
| Availability                       | US v. South Korea   | 6               | 10                | 3               |
| Delivery terms                     | US v. South Korea   | 7               | 11                | 1               |
| Delivery time                      | US v. South Korea   | 8               | 9                 | 2               |
| Discounts offered                  | US v. South Korea   | 3               | 13                | 3               |
| Minimum quantity requirements      | US v. South Korea   | 3               | 15                | 1               |
| Packaging                          | US v. South Korea   | 3               | 14                | 1               |
| Payment terms                      | US v. South Korea   | 3               | 13                | 2               |
| Price                              | US v. South Korea   | 1               | 11                | 7               |
| Product consistency                | US v. South Korea   | 2               | 15                | 2               |
| Product range                      | US v. South Korea   | 5               | 10                | 3               |
| Quality meets industry standards   | US v. South Korea   | 4               | 14                | 1               |
| Quality exceeds industry standards | US v. South Korea   | 4               | 13                | 1               |
| Reliability of supply              | US v. South Korea   | 3               | 13                | 3               |
| Technical support/service          | US v. South Korea   | 4               | 14                | 1               |
| U.S. transportation costs          | US v. South Korea   | 4               | 11                | 3               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| Factor                             | Country pair        | Superior | Comparable | Inferior |
|------------------------------------|---------------------|----------|------------|----------|
| Availability                       | Argentina v. Mexico | 0        | 16         | 0        |
| Delivery terms                     | Argentina v. Mexico | 0        | 15         | 0        |
| Delivery time                      | Argentina v. Mexico | 0        | 15         | 0        |
| Discounts offered                  | Argentina v. Mexico | 0        | 14         | 0        |
| Minimum quantity requirements      | Argentina v. Mexico | 0        | 15         | 0        |
| Packaging                          | Argentina v. Mexico | 0        | 15         | 0        |
| Payment terms                      | Argentina v. Mexico | 0        | 15         | 0        |
| Price                              | Argentina v. Mexico | 0        | 15         | 0        |
| Product consistency                | Argentina v. Mexico | 0        | 16         | 0        |
| Product range                      | Argentina v. Mexico | 1        | 13         | 1        |
| Quality meets industry standards   | Argentina v. Mexico | 0        | 16         | 0        |
| Quality exceeds industry standards | Argentina v. Mexico | 0        | 13         | 0        |
| Reliability of supply              | Argentina v. Mexico | 0        | 15         | 0        |
| Technical support/service          | Argentina v. Mexico | 0        | 15         | 0        |
| U.S. transportation costs          | Argentina v. Mexico | 0        | 13         | 1        |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| Factor                             | Country pair        | Superior | Comparable | Inferior |
|------------------------------------|---------------------|----------|------------|----------|
| Availability                       | Argentina v. Russia | 2        | 6          | 0        |
| Delivery terms                     | Argentina v. Russia | 1        | 7          | 0        |
| Delivery time                      | Argentina v. Russia | 2        | 6          | 0        |
| Discounts offered                  | Argentina v. Russia | 1        | 7          | 0        |
| Minimum quantity requirements      | Argentina v. Russia | 1        | 7          | 0        |
| Packaging                          | Argentina v. Russia | 1        | 7          | 0        |
| Payment terms                      | Argentina v. Russia | 1        | 7          | 0        |
| Price                              | Argentina v. Russia | 1        | 5          | 1        |
| Product consistency                | Argentina v. Russia | 2        | 6          | 0        |
| Product range                      | Argentina v. Russia | 3        | 5          | 0        |
| Quality meets industry standards   | Argentina v. Russia | 1        | 7          | 0        |
| Quality exceeds industry standards | Argentina v. Russia | 2        | 6          | 0        |
| Reliability of supply              | Argentina v. Russia | 4        | 4          | 0        |
| Technical support/service          | Argentina v. Russia | 1        | 7          | 0        |
| U.S. transportation costs          | Argentina v. Russia | 1        | 6          | 1        |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b>      | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|--------------------------|-----------------|-------------------|-----------------|
| Availability                       | Argentina v. South Korea | 1               | 9                 | 0               |
| Delivery terms                     | Argentina v. South Korea | 1               | 9                 | 0               |
| Delivery time                      | Argentina v. South Korea | 1               | 9                 | 0               |
| Discounts offered                  | Argentina v. South Korea | 1               | 9                 | 0               |
| Minimum quantity requirements      | Argentina v. South Korea | 1               | 9                 | 0               |
| Packaging                          | Argentina v. South Korea | 1               | 9                 | 0               |
| Payment terms                      | Argentina v. South Korea | 1               | 9                 | 0               |
| Price                              | Argentina v. South Korea | 0               | 8                 | 2               |
| Product consistency                | Argentina v. South Korea | 2               | 8                 | 0               |
| Product range                      | Argentina v. South Korea | 2               | 8                 | 0               |
| Quality meets industry standards   | Argentina v. South Korea | 2               | 8                 | 0               |
| Quality exceeds industry standards | Argentina v. South Korea | 2               | 7                 | 0               |
| Reliability of supply              | Argentina v. South Korea | 1               | 9                 | 0               |
| Technical support/service          | Argentina v. South Korea | 2               | 8                 | 0               |
| U.S. transportation costs          | Argentina v. South Korea | 0               | 8                 | 1               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b> | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|---------------------|-----------------|-------------------|-----------------|
| Availability                       | Mexico v. Russia    | 5               | 6                 | 0               |
| Delivery terms                     | Mexico v. Russia    | 4               | 7                 | 0               |
| Delivery time                      | Mexico v. Russia    | 5               | 6                 | 0               |
| Discounts offered                  | Mexico v. Russia    | 2               | 9                 | 0               |
| Minimum quantity requirements      | Mexico v. Russia    | 2               | 9                 | 0               |
| Packaging                          | Mexico v. Russia    | 2               | 9                 | 0               |
| Payment terms                      | Mexico v. Russia    | 2               | 8                 | 0               |
| Price                              | Mexico v. Russia    | 3               | 7                 | 1               |
| Product consistency                | Mexico v. Russia    | 3               | 8                 | 0               |
| Product range                      | Mexico v. Russia    | 3               | 5                 | 1               |
| Quality meets industry standards   | Mexico v. Russia    | 2               | 9                 | 0               |
| Quality exceeds industry standards | Mexico v. Russia    | 4               | 6                 | 0               |
| Reliability of supply              | Mexico v. Russia    | 6               | 5                 | 0               |
| Technical support/service          | Mexico v. Russia    | 3               | 8                 | 0               |
| U.S. transportation costs          | Mexico v. Russia    | 3               | 7                 | 1               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b>   | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|-----------------------|-----------------|-------------------|-----------------|
| Availability                       | Mexico v. South Korea | 1               | 10                | 1               |
| Delivery terms                     | Mexico v. South Korea | 1               | 10                | 0               |
| Delivery time                      | Mexico v. South Korea | 2               | 10                | 0               |
| Discounts offered                  | Mexico v. South Korea | 1               | 11                | 0               |
| Minimum quantity requirements      | Mexico v. South Korea | 1               | 10                | 1               |
| Packaging                          | Mexico v. South Korea | 1               | 11                | 0               |
| Payment terms                      | Mexico v. South Korea | 1               | 10                | 1               |
| Price                              | Mexico v. South Korea | 1               | 9                 | 2               |
| Product consistency                | Mexico v. South Korea | 2               | 10                | 0               |
| Product range                      | Mexico v. South Korea | 2               | 9                 | 1               |
| Quality meets industry standards   | Mexico v. South Korea | 2               | 10                | 0               |
| Quality exceeds industry standards | Mexico v. South Korea | 2               | 9                 | 0               |
| Reliability of supply              | Mexico v. South Korea | 1               | 10                | 1               |
| Technical support/service          | Mexico v. South Korea | 2               | 10                | 0               |
| U.S. transportation costs          | Mexico v. South Korea | 1               | 10                | 1               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b>   | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|-----------------------|-----------------|-------------------|-----------------|
| Availability                       | Russia v. South Korea | 0               | 6                 | 4               |
| Delivery terms                     | Russia v. South Korea | 0               | 8                 | 2               |
| Delivery time                      | Russia v. South Korea | 0               | 8                 | 2               |
| Discounts offered                  | Russia v. South Korea | 0               | 7                 | 3               |
| Minimum quantity requirements      | Russia v. South Korea | 0               | 8                 | 2               |
| Packaging                          | Russia v. South Korea | 0               | 8                 | 2               |
| Payment terms                      | Russia v. South Korea | 0               | 8                 | 2               |
| Price                              | Russia v. South Korea | 2               | 6                 | 2               |
| Product consistency                | Russia v. South Korea | 0               | 8                 | 2               |
| Product range                      | Russia v. South Korea | 0               | 9                 | 1               |
| Quality meets industry standards   | Russia v. South Korea | 0               | 9                 | 1               |
| Quality exceeds industry standards | Russia v. South Korea | 0               | 8                 | 2               |
| Reliability of supply              | Russia v. South Korea | 0               | 5                 | 5               |
| Technical support/service          | Russia v. South Korea | 0               | 9                 | 1               |
| U.S. transportation costs          | Russia v. South Korea | 0               | 8                 | 2               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b> | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|---------------------|-----------------|-------------------|-----------------|
| Availability                       | US v. Nonsubject    | 5               | 9                 | 1               |
| Delivery terms                     | US v. Nonsubject    | 4               | 10                | 0               |
| Delivery time                      | US v. Nonsubject    | 6               | 8                 | 0               |
| Discounts offered                  | US v. Nonsubject    | 2               | 11                | 1               |
| Minimum quantity requirements      | US v. Nonsubject    | 1               | 13                | 0               |
| Packaging                          | US v. Nonsubject    | 1               | 13                | 0               |
| Payment terms                      | US v. Nonsubject    | 1               | 13                | 0               |
| Price                              | US v. Nonsubject    | 0               | 10                | 3               |
| Product consistency                | US v. Nonsubject    | 1               | 12                | 2               |
| Product range                      | US v. Nonsubject    | 2               | 10                | 3               |
| Quality meets industry standards   | US v. Nonsubject    | 1               | 12                | 1               |
| Quality exceeds industry standards | US v. Nonsubject    | 2               | 11                | 1               |
| Reliability of supply              | US v. Nonsubject    | 2               | 11                | 1               |
| Technical support/service          | US v. Nonsubject    | 3               | 9                 | 2               |
| U.S. transportation costs          | US v. Nonsubject    | 2               | 10                | 1               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b>     | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|-------------------------|-----------------|-------------------|-----------------|
| Availability                       | Argentina v. Nonsubject | 1               | 8                 | 0               |
| Delivery terms                     | Argentina v. Nonsubject | 0               | 9                 | 0               |
| Delivery time                      | Argentina v. Nonsubject | 0               | 9                 | 0               |
| Discounts offered                  | Argentina v. Nonsubject | 0               | 9                 | 0               |
| Minimum quantity requirements      | Argentina v. Nonsubject | 0               | 9                 | 0               |
| Packaging                          | Argentina v. Nonsubject | 0               | 9                 | 0               |
| Payment terms                      | Argentina v. Nonsubject | 0               | 9                 | 0               |
| Price                              | Argentina v. Nonsubject | 0               | 7                 | 2               |
| Product consistency                | Argentina v. Nonsubject | 1               | 8                 | 0               |
| Product range                      | Argentina v. Nonsubject | 1               | 8                 | 0               |
| Quality meets industry standards   | Argentina v. Nonsubject | 1               | 8                 | 0               |
| Quality exceeds industry standards | Argentina v. Nonsubject | 1               | 8                 | 0               |
| Reliability of supply              | Argentina v. Nonsubject | 2               | 8                 | 0               |
| Technical support/service          | Argentina v. Nonsubject | 1               | 8                 | 0               |
| U.S. transportation costs          | Argentina v. Nonsubject | 0               | 9                 | 0               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b>  | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|----------------------|-----------------|-------------------|-----------------|
| Availability                       | Mexico v. Nonsubject | 2               | 9                 | 1               |
| Delivery terms                     | Mexico v. Nonsubject | 0               | 9                 | 1               |
| Delivery time                      | Mexico v. Nonsubject | 1               | 9                 | 0               |
| Discounts offered                  | Mexico v. Nonsubject | 0               | 10                | 0               |
| Minimum quantity requirements      | Mexico v. Nonsubject | 0               | 10                | 0               |
| Packaging                          | Mexico v. Nonsubject | 0               | 10                | 0               |
| Payment terms                      | Mexico v. Nonsubject | 0               | 10                | 0               |
| Price                              | Mexico v. Nonsubject | 1               | 8                 | 1               |
| Product consistency                | Mexico v. Nonsubject | 1               | 9                 | 0               |
| Product range                      | Mexico v. Nonsubject | 1               | 9                 | 1               |
| Quality meets industry standards   | Mexico v. Nonsubject | 1               | 10                | 0               |
| Quality exceeds industry standards | Mexico v. Nonsubject | 1               | 9                 | 0               |
| Reliability of supply              | Mexico v. Nonsubject | 1               | 10                | 0               |
| Technical support/service          | Mexico v. Nonsubject | 1               | 10                | 0               |
| U.S. transportation costs          | Mexico v. Nonsubject | 0               | 9                 | 0               |

Table continued.

**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| <b>Factor</b>                      | <b>Country pair</b>  | <b>Superior</b> | <b>Comparable</b> | <b>Inferior</b> |
|------------------------------------|----------------------|-----------------|-------------------|-----------------|
| Availability                       | Russia v. Nonsubject | 0               | 6                 | 2               |
| Delivery terms                     | Russia v. Nonsubject | 0               | 7                 | 1               |
| Delivery time                      | Russia v. Nonsubject | 0               | 6                 | 2               |
| Discounts offered                  | Russia v. Nonsubject | 0               | 7                 | 1               |
| Minimum quantity requirements      | Russia v. Nonsubject | 0               | 7                 | 1               |
| Packaging                          | Russia v. Nonsubject | 0               | 7                 | 1               |
| Payment terms                      | Russia v. Nonsubject | 0               | 7                 | 1               |
| Price                              | Russia v. Nonsubject | 1               | 6                 | 1               |
| Product consistency                | Russia v. Nonsubject | 0               | 7                 | 1               |
| Product range                      | Russia v. Nonsubject | 0               | 6                 | 2               |
| Quality meets industry standards   | Russia v. Nonsubject | 0               | 7                 | 1               |
| Quality exceeds industry standards | Russia v. Nonsubject | 0               | 7                 | 1               |
| Reliability of supply              | Russia v. Nonsubject | 0               | 6                 | 2               |
| Technical support/service          | Russia v. Nonsubject | 0               | 7                 | 1               |
| U.S. transportation costs          | Russia v. Nonsubject | 0               | 7                 | 1               |

Table continued.



**Table II-14 Continued****OCTG: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

| Factor                             | Country pair              | Superior | Comparable | Inferior |
|------------------------------------|---------------------------|----------|------------|----------|
| Availability                       | South Korea v. Nonsubject | 1        | 9          | 2        |
| Delivery terms                     | South Korea v. Nonsubject | 1        | 10         | 1        |
| Delivery time                      | South Korea v. Nonsubject | 0        | 11         | 1        |
| Discounts offered                  | South Korea v. Nonsubject | 0        | 11         | 1        |
| Minimum quantity requirements      | South Korea v. Nonsubject | 0        | 11         | 1        |
| Packaging                          | South Korea v. Nonsubject | 0        | 11         | 1        |
| Payment terms                      | South Korea v. Nonsubject | 0        | 11         | 1        |
| Price                              | South Korea v. Nonsubject | 1        | 11         | 0        |
| Product consistency                | South Korea v. Nonsubject | 0        | 11         | 1        |
| Product range                      | South Korea v. Nonsubject | 1        | 10         | 1        |
| Quality meets industry standards   | South Korea v. Nonsubject | 1        | 10         | 1        |
| Quality exceeds industry standards | South Korea v. Nonsubject | 0        | 11         | 1        |
| Reliability of supply              | South Korea v. Nonsubject | 1        | 10         | 1        |
| Technical support/service          | South Korea v. Nonsubject | 0        | 11         | 1        |
| U.S. transportation costs          | South Korea v. Nonsubject | 2        | 10         | 0        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: A rating of superior means that price/U.S. transportation cost is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

## Comparison of U.S.-produced and imported OCTG

In order to determine whether U.S.-produced OCTG can generally be used in the same applications as imports from subject and nonsubject sources, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-15 to II-17, U.S. producers and importers most often described U.S., subject, and nonsubject OCTG as always interchangeable. Purchasers were more likely to describe interchangeability as frequent or sometimes (although many purchasers still described interchangeability as always).

In additional comments, U.S. producer \*\*\* stated that OCTG meeting API standards are interchangeable, but that some operators prefer not to mix products from different suppliers in the same string design. Importer \*\*\* stated that local mills may avoid producing tubular products and do not produce "specified" outer diameter OCTG products that \*\*\* mills provide. Importer \*\*\* described all OCTG as interchangeable and described the subject countries as supplying surface and casing OCTG that are not high pressure or critical-use products in the well bore. Importer \*\*\* described U.S. and Ukrainian OCTG as sometimes interchangeable, depending on the rig, well, and drilling firm. It added that its new proprietary threaded product is not easily interchangeable with other OCTG.

Among purchasers, \*\*\* stated that it is difficult for it to use U.S. and South Korean OCTG interchangeably because U.S. product is not available in larger diameters. \*\*\* stated that U.S. product is not interchangeable with Argentine and Mexican product for sour service applications, and it added that Argentine and Mexican product for deep water applications was produced to rigorous specifications. \*\*\* also stated that OCTG for sour service applications is not always available from U.S. producers. \*\*\* described U.S., Argentine, and Mexican product as produced for a wide range of specifications, while Russian and South Korean product is mostly welded, non-heat-treated specifications. \*\*\* described U.S., Russian, and South Korean product as more limited in diameter offerings than Argentine and Mexican product. \*\*\* stated that premium connections from one supplier to another are never interchangeable, and it added that U.S. product is not available in larger diameters. \*\*\* stated that interchangeability with Chinese OCTG is affected by implementation of quality controls. \*\*\* described interchangeability as determined by product mix, connection restrictions, quality, and delivery.

**Table II-15**  
**OCTG: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

| Country pair              | Always | Frequently | Sometimes | Never |
|---------------------------|--------|------------|-----------|-------|
| U.S. vs. Argentina        | 8      | 3          | 1         | 0     |
| U.S. vs. Mexico           | 8      | 3          | 1         | 0     |
| U.S. vs. Russia           | 9      | 3          | 0         | 0     |
| U.S. vs. South Korea      | 9      | 3          | 1         | 0     |
| Argentina vs. Mexico      | 7      | 3          | 0         | 0     |
| Argentina vs. Russia      | 8      | 2          | 1         | 0     |
| Argentina vs. South Korea | 8      | 2          | 1         | 0     |
| Mexico vs. Russia         | 7      | 2          | 1         | 0     |
| Mexico vs. South Korea    | 7      | 2          | 1         | 0     |
| Russia vs. South Korea    | 9      | 2          | 0         | 0     |
| U.S. vs. Other            | 7      | 4          | 1         | 0     |
| Argentina vs. Other       | 7      | 2          | 2         | 0     |
| Mexico vs. Other          | 6      | 2          | 2         | 0     |
| Russia vs. Other          | 7      | 3          | 1         | 0     |
| South Korea vs. Other     | 7      | 3          | 1         | 0     |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table II-16**  
**OCTG: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

| Country pair              | Always | Frequently | Sometimes | Never |
|---------------------------|--------|------------|-----------|-------|
| U.S. vs. Argentina        | 8      | 2          | 2         | 0     |
| U.S. vs. Mexico           | 8      | 2          | 2         | 0     |
| U.S. vs. Russia           | 12     | 4          | 1         | 0     |
| U.S. vs. South Korea      | 10     | 3          | 2         | 0     |
| Argentina vs. Mexico      | 8      | 3          | 0         | 0     |
| Argentina vs. Russia      | 8      | 3          | 2         | 0     |
| Argentina vs. South Korea | 8      | 2          | 1         | 1     |
| Mexico vs. Russia         | 8      | 4          | 1         | 0     |
| Mexico vs. South Korea    | 8      | 1          | 2         | 1     |
| Russia vs. South Korea    | 10     | 2          | 0         | 1     |
| U.S. vs. Other            | 7      | 8          | 5         | 0     |
| Argentina vs. Other       | 6      | 3          | 4         | 0     |
| Mexico vs. Other          | 6      | 3          | 4         | 0     |
| Russia vs. Other          | 7      | 4          | 3         | 0     |
| South Korea vs. Other     | 7      | 4          | 3         | 0     |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table II-17**  
**OCTG: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

| Country pair              | Always | Frequently | Sometimes | Never |
|---------------------------|--------|------------|-----------|-------|
| U.S. vs. Argentina        | 9      | 8          | 6         | 1     |
| U.S. vs. Mexico           | 9      | 9          | 7         | 1     |
| U.S. vs. Russia           | 6      | 6          | 6         | 0     |
| U.S. vs. South Korea      | 8      | 8          | 5         | 2     |
| Argentina vs. Mexico      | 8      | 9          | 2         | 0     |
| Argentina vs. Russia      | 3      | 4          | 4         | 1     |
| Argentina vs. South Korea | 5      | 5          | 4         | 1     |
| Mexico vs. Russia         | 3      | 5          | 4         | 1     |
| Mexico vs. South Korea    | 5      | 6          | 5         | 1     |
| Russia vs. South Korea    | 6      | 6          | 2         | 0     |
| U.S. vs. Other            | 4      | 5          | 4         | 1     |
| Argentina vs. Other       | 3      | 1          | 3         | 0     |
| Mexico vs. Other          | 3      | 3          | 4         | 0     |
| Russia vs. Other          | 4      | 3          | 0         | 0     |
| South Korea vs. Other     | 4      | 3          | 2         | 0     |

Source: Compiled from data submitted in response to Commission questionnaires.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of OCTG from the United States, subject, or nonsubject countries. As seen in tables II-18 to II-20, a majority of U.S. producers and

importers indicated that, for most country pairs, factors other than price were sometimes or never significant in comparing OCTG from different sources. Purchasers were more likely than U.S. producers or importers to indicate that factors other than price were frequently significant, although many purchasers also answered that such factors were never or sometimes significant as well.

In additional comments, U.S. \*\*\* stated that its customers tell it that it is their preferred source for reasons including quality, product range, availability, and transportation costs. Nonetheless, \*\*\* added that it cannot compete on price with subject imports. Importer \*\*\* stated that U.S. OCTG is considered to be highest quality, with Korean product also considered to be high quality, but primarily available as welded. It continued that Korean seamless OCTG is not as widely available due to low Korean seamless OCTG capacity. It added that Tenaris's Argentine product is considered to be the same quality as U.S. product, and that Russian product is considered as acceptable but not the best quality. Other importers described important factors other than price including availability, lead times, quality, transportation costs, technical support, and warranties.

Among purchasers, \*\*\* stated that for its specifications, U.S. producers do not offer an equivalent product to Argentine and Mexican OCTG. \*\*\* stated that Argentine and Mexican OCTG for sour service applications is not interchangeable with U.S. product due to quality issues. \*\*\* also indicated that U.S. mills do not offer OCTG for sour service applications. \*\*\* stated that technical qualifications and availability are more important purchasing factors than price. \*\*\* described availability and product range for Russian and South Korean OCTG as lower than for U.S., Argentine, and Mexican OCTG. \*\*\* stated that availability was an important factor, and that U.S. mills do not manufacture specific diameters. \*\*\* described quality, supply assurance, and logistics as important factors other than price. \*\*\* compared U.S. product to that of Russia and South Korea and stated that product from South Korea has advantages in availability, consistency, product range, and reliability. \*\*\* stated that the certifications and reliability of Argentine and Mexican mills, as opposed to the failure history and reputation of product quality for Russian and South Korean product, were factors in its purchasing decisions. \*\*\* stated that Russian and South Korean product had less product range and availability than U.S., Argentine, and Mexican product. \*\*\*

**Table II-18**  
**OCTG: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

| Country pair              | Always | Frequently | Sometimes | Never |
|---------------------------|--------|------------|-----------|-------|
| U.S. vs. Argentina        | 1      | 1          | 4         | 5     |
| U.S. vs. Mexico           | 0      | 1          | 4         | 5     |
| U.S. vs. Russia           | 1      | 0          | 4         | 6     |
| U.S. vs. South Korea      | 1      | 0          | 5         | 6     |
| Argentina vs. Mexico      | 0      | 0          | 3         | 5     |
| Argentina vs. Russia      | 2      | 0          | 3         | 4     |
| Argentina vs. South Korea | 2      | 0          | 3         | 4     |
| Mexico vs. Russia         | 1      | 0          | 3         | 4     |
| Mexico vs. South Korea    | 1      | 0          | 3         | 4     |
| Russia vs. South Korea    | 1      | 0          | 3         | 5     |
| U.S. vs. Other            | 1      | 1          | 5         | 4     |
| Argentina vs. Other       | 1      | 1          | 4         | 4     |
| Mexico vs. Other          | 0      | 1          | 4         | 4     |
| Russia vs. Other          | 1      | 1          | 4         | 4     |
| South Korea vs. Other     | 1      | 1          | 4         | 4     |

Source: Compiled from data submitted in response to Commission questionnaires.

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<sup>24</sup> See email from \*\*\*.

**Table II-19****OCTG: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

| Country pair              | Always | Frequently | Sometimes | Never |
|---------------------------|--------|------------|-----------|-------|
| U.S. vs. Argentina        | 1      | 2          | 3         | 4     |
| U.S. vs. Mexico           | 1      | 2          | 3         | 4     |
| U.S. vs. Russia           | 2      | 3          | 4         | 6     |
| U.S. vs. South Korea      | 2      | 1          | 5         | 5     |
| Argentina vs. Mexico      | 1      | 0          | 2         | 5     |
| Argentina vs. Russia      | 2      | 2          | 3         | 4     |
| Argentina vs. South Korea | 3      | 0          | 2         | 5     |
| Mexico vs. Russia         | 2      | 2          | 3         | 4     |
| Mexico vs. South Korea    | 3      | 1          | 2         | 4     |
| Russia vs. South Korea    | 2      | 0          | 4         | 5     |
| U.S. vs. Other            | 3      | 7          | 6         | 4     |
| Argentina vs. Other       | 1      | 4          | 4         | 4     |
| Mexico vs. Other          | 1      | 5          | 3         | 4     |
| Russia vs. Other          | 1      | 4          | 5         | 4     |
| South Korea vs. Other     | 1      | 5          | 4         | 4     |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table II-20****OCTG: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

| Country pair              | Always | Frequently | Sometimes | Never |
|---------------------------|--------|------------|-----------|-------|
| U.S. vs. Argentina        | 2      | 5          | 9         | 5     |
| U.S. vs. Mexico           | 2      | 7          | 9         | 7     |
| U.S. vs. Russia           | 1      | 5          | 7         | 3     |
| U.S. vs. South Korea      | 2      | 6          | 6         | 8     |
| Argentina vs. Mexico      | 1      | 1          | 7         | 7     |
| Argentina vs. Russia      | 2      | 2          | 3         | 2     |
| Argentina vs. South Korea | 2      | 2          | 3         | 5     |
| Mexico vs. Russia         | 2      | 2          | 4         | 3     |
| Mexico vs. South Korea    | 2      | 2          | 4         | 7     |
| Russia vs. South Korea    | 0      | 2          | 6         | 6     |
| U.S. vs. Other            | 1      | 3          | 6         | 3     |
| Argentina vs. Other       | 0      | 1          | 3         | 1     |
| Mexico vs. Other          | 0      | 2          | 4         | 2     |
| Russia vs. Other          | 0      | 2          | 4         | 2     |
| South Korea vs. Other     | 0      | 2          | 4         | 2     |

Source: Compiled from data submitted in response to Commission questionnaires.

## **Elasticity estimates**

This section discusses elasticity estimates; parties were encouraged to comment on these estimates as attachments to their prehearing or posthearing briefs. None did so.

### **U.S. supply elasticity**

The domestic supply elasticity for OCTG measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of OCTG. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced OCTG.

U.S. producers have substantial excess capacity. Nonetheless, reports from both purchasers and some U.S. producers indicates that there are shortages of OCTG from U.S. producers, perhaps because of raw material and/or labor shortages. Analysis of these factors above indicates that the U.S. industry has the ability to somewhat increase or decrease shipments to the U.S. market; an estimate in the range of 2 to 5 is suggested.

### **U.S. demand elasticity**

The U.S. demand elasticity for OCTG measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of OCTG. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the OCTG in the production of any downstream products. Based on the available information, the aggregate demand for OCTG is likely to be moderately inelastic; a range of -0.75 to -0.1 is suggested.

### **Substitution elasticity**

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.<sup>25</sup> Product differentiation, in turn, depends upon such factors as physical characteristics (such as method of manufacture or available sizes), quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced OCTG and imported OCTG is likely to be in the range of 3 to 5. Market

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<sup>25</sup> The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

participants generally reported a high degree of interchangeability between U.S. and imported OCTG and a high level of comparability between U.S. and subject product in many purchasing factors. Nonetheless, some specific products may only be available from particular sources, and factors other than price (such as availability) are also sometimes important.



## Part III: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of 19 firms that staff believes accounted for the large majority of U.S. OCTG production during 2021.

### U.S. producers

The Commission issued a U.S. producer questionnaire to 17 firms based on information contained in the petition, as well as an additional 15 firms that maintain API certification<sup>1</sup> to manufacture and/or process OCTG in accordance with specification 5CT. Nineteen firms provided usable data on their operations.<sup>2 3</sup> Staff believes that these responses represent the large majority of U.S. OCTG production during 2021.

OCTG producers include both mills and processors (toll and non-toll). Mills own and operate machinery to form welded or seamless OCTG. Processors own and operate finishing lines necessary to heat treat OCTG. Table III-1 lists U.S. producers of OCTG, their production locations, positions on the petition, and shares of total production.

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<sup>1</sup> American Petroleum Institute, Composite List, <https://mycerts.api.org/Search/CompositeSearch>.

<sup>2</sup> This count includes U.S. producer IPSCO, which was acquired by Tenaris USA in January 2020. Tenaris USA provided data requested by the Commission concerning IPSCO's operations in 2019, prior to the acquisition. For the purpose of this report, unless otherwise noted, data concerning the OCTG operations of Tenaris USA and IPSCO are presented jointly.

<sup>3</sup> Eleven firms (\*\*\*) certified that they have not produced OCTG in the United States at any time since January 1, 2019.

Additionally, \*\*\*. Email from \*\*\*, August 31, 2022.

An additional U.S. producer, \*\*\*. Despite numerous attempts by staff, \*\*\* did not provide a response to the Commission's U.S. producer questionnaire.

**Table III-1**

**OCTG: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2021**

Shares in percent

| <b>Firm</b>            | <b>Position on petition</b> | <b>Production location(s)</b>  | <b>Share of mill production</b> | <b>Share of non-toll processor production</b> | <b>Share of toll processor production</b> |
|------------------------|-----------------------------|--|---------------------------------|---|---|
| Axis                   | ***                         | Bryan, TX  | ***                             | ***   | ***                                       |
| Benteler               | ***                         | Shreveport, LA   | ***                             | ***   | ***                                       |
| Borusan                | Petitioner                  | Baytown, TX  | ***                             | ***   | ***                                       |
| EVRAZ                  | ***                         | Pueblo, CO   | ***                             | ***   | ***                                       |
| PTC Tubular            | Petitioner                  | Liberty, TX<br>Houston, TX   | ***                             | ***   | ***                                       |
| RDT                    | ***                         | Beasley, TX  | ***                             | ***   | ***                                       |
| SeAH Steel             | ***                         | Houston, TX  | ***                             | ***   | ***                                       |
| Splendora              | ***                         | Cleveland, TX  | ***                             | ***   | ***                                       |
| Tejas Tubular          | ***                         | Stephenville, TX<br>Houston, TX  | ***                             | ***   | ***                                       |
| Tenaris USA / IPSCO    | ***                         | Blytheville, AR<br>Conroe TX<br>Bay City, TX<br>Koppel, PA<br>Ambridge, PA<br>Wilder, KY | ***                             | ***   | ***                                       |
| Texas Steel Conversion | ***                         | Houston, TX<br>Bryan, TX   | ***                             | ***   | ***                                       |
| Texas Tubular          | ***                         | Lone Star, TX  | ***                             | ***   | ***                                       |
| Timken Steel           | ***                         | Canton, OH   | ***                             | ***   | ***                                       |
| Tubular Services       | ***                         | Channelview, TX<br>Houston, TX   | ***                             | ***   | ***                                       |
| U.S. Steel             | Petitioner                  | Fairfield, AL<br>Lorain, OH<br>Lone Star, TX<br>Houston, TX                              | ***                             | ***   | ***                                       |
| Vallourec              | ***                         | Youngstown, OH<br>Houston, TX<br>Muskogee, OK  | ***                             | ***   | ***                                       |
| Welded Tube USA        | Petitioner                  | Lackawanna, NY   | ***                             | ***   | ***                                       |
| Wheatland Tube         | ***                         | Warren, OH<br>Niles, OH  | ***                             | ***   | ***                                       |
| All firms              | Various                     | Various  | 100.0                           | 100.0   | 100.0                                     |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Tables III-2 through III-4 present information on U.S. producers' ownership, related and/or affiliated firms. As indicated in tables III-3 and III-4, four U.S. producers (\*\*\*) reported that they are related to importers/exporters of the subject merchandise and three U.S. producers (\*\*\*) reported that they are related to foreign producers of the subject merchandise. In addition, as discussed in greater detail below, three U.S. producers (\*\*\*) directly import the subject merchandise and two U.S. producers (\*\*\*) purchase the subject merchandise from U.S. importers.

**Table III-2**  
**OCTG: U.S. producers' ownership**

| Reporting firm | Related firm | Details of relationship |
|----------------|--------------|-------------------------|
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table III-3**  
**OCTG: U.S. producers' related importers/exporters**

| Reporting firm | Related firm | Details of relationship |
|----------------|--------------|-------------------------|
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |
| ***            | ***          | ***                     |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table III-4**

**OCTG: U.S. producers' related producers**

| <b>Reporting firm</b> | <b>Related firm</b> | <b>Details of relationship</b> |
|-----------------------|---------------------|--------------------------------|
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |
| ***                   | ***                 | ***                            |

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-5 presents U.S. producers' reported changes in operations since January 1, 2019.

**Table III-5**  
**OCTG: U.S. producers' reported changes in operations, since January 1, 2019**

| Item           | Firm name and narrative response on changes in operations |
|----------------|---|
| Plant openings | ***   |
| Plant closings | ***   |
| Plant closings | ***   |
| Plant closings | ***   |
| Plant closings | ***   |
| Plant closings | ***   |
| Plant closings | ***   |
| Plant closings | ***   |

| Item                | Firm name and narrative response on changes in operations |
|---------------------|---|
| Prolonged shutdowns | ***   |
| Prolonged shutdowns | ***   |
| Prolonged shutdowns | ***   |
| Prolonged shutdowns | ***   |
| Prolonged shutdowns | ***   |
| Prolonged shutdowns | ***   |
| Prolonged shutdowns | ***   |
| Prolonged shutdowns | ***   |
| Prolonged shutdowns | ***   |

| Item           | Firm name and narrative response on changes in operations |
|----------------|---|
| Relocations    | ***   |
| Expansions     | ***   |
| Expansions     | ***   |
| Expansions     | ***   |
| Expansions     | ***   |
| Acquisitions   | ***   |
| Acquisitions   | ***   |
| Acquisitions   | ***   |
| Consolidations | ***   |

| Item                     | Firm name and narrative response on changes in operations |
|--------------------------|---|
| Production curtailments  | ***   |
| Production curtailments  | ***   |
| Production curtailments  | ***   |
| Production curtailments  | ***   |
| Production curtailments  | ***   |
| Revised labor agreements | ***   |
| Revised labor agreements | ***   |
| Revised labor agreements | ***   |



| Item  | Firm name and narrative response on changes in operations |
|-------|---|
| Other | ***   |
| Other | ***   |
| Other | ***   |
| Other | ***   |

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-6 presents recent developments in the U.S. industry since January 1, 2019.

**Table III-6**  
**OCTG: Recent developments in the U.S. industry, since January 1, 2019**

| Item               | Firm        | Event  |
|--------------------|-------------|--|
| Plant closing      | IPSCO       | In June 2019, IPSCO announced that it would close its Camanche, IA, OCTG pipe mill and lay off over 100 workers.   |
| Acquisition        | Tenaris USA | In January 2020, Tenaris completed its acquisition of IPSCO Tubulars, Inc. The IPSCO facilities acquired by Tenaris included a steel melt shop and heat treatment facility in Koppel, PA, and a seamless pipe and tube mill in Ambridge, PA.   |
| Prolonged shutdown | Tenaris USA | In January 2020, Tenaris announced that it would suspend operations at its welded pipe mill in Blytheville, AR and lay off 74 employees.   |
| Prolonged shutdown | U.S. Steel  | In March 2020, U.S. Steel announced that in May 2020 the company would idle all or most operations at Lone Star Tubular in Texas and Lorain Tubular in Ohio for an indefinite period. The company reported that this was in response to weak market conditions including continued high levels of imports and decreased demand driven by a sudden, significant drop in oil prices. |

| <b>Item</b>                  | <b>Firm</b> | <b>Event</b>  |
|------------------------------|-------------|---|
| Prolonged shutdown           | Tenaris USA | In March 2020, Tenaris announced that it would suspend all operations at its Koppel, PA, and Ambridge, PA, facilities on March 31, 2020, suspend all operations at its Brookfield, OH, threading plant on April 17, 2020, and implement employee reductions at its Baytown, TX, and Hickman, AR, facilities on April 17, 2020. Tenaris cited the sharp decline in oil prices and the subsequent decrease in market activity as the reason for the suspended operations and employee reductions. |
| Prolonged shutdown           | Tenaris USA | In May 2020, Tenaris announced that it would lay off 200 employees at its seamless pipe and tube mill in Baytown, TX. Tenaris cited the sharp decline in oil prices and the subsequent decrease in market activity as well as the COVID-19 pandemic as the reasons for the employee reductions.   |
| Plant opening                | SeAH Steel  | In November 2020, SeAH Steel announced that it had opened a new tube mill in Houston, TX. The new mill specializes in OCTG and line pipe products ranging from 2.375 inches to 4.500 inches in diameter with a production capacity of 110,000 metric tons per year.   |
| Production increase          | Tenaris USA | In March 2021, Tenaris added about 140 employees at its Conroe, TX, plant to scale up heat treatment and finishing operations. Tenaris stated that the Conroe plant had scaled down production in 2019 due to reduced drilling activity, subsequent low demand for tubular products and continued high level of imports of OCTG.  |
| Production restart           | EVRAZ       | In the beginning of the second quarter of 2021, EVRAZ restarted production at its seamless pipe and tube mill in Pueblo, Colorado. The Pueblo mill was originally idled at the end of the second quarter of 2020.   |
| Production restart/expansion | Tenaris USA | In June 2021, Tenaris restarted production at its steel melt shop in Koppel, PA, following \$15 million of investments. The melt shop would provide steel bars to Tenaris' seamless pipe mills in the United States and Canada.   |
| Production restart           | Tenaris USA | In August 2021, Tenaris restarted production at its seamless pipe and tube mill in Ambridge, PA.  |
| Production restart           | Tenaris USA | In October 2021, Tenaris reactivated its Baytown, TX, heat treatment and finishing lines to process pipe and tube from its Bay City, TX, seamless pipe and tube mill.   |
| Production increase          | Tenaris USA | In January 2022, Tenaris announced that it was increasing production at its Hickman, AR, welded pipe and tube mill and would hire 250 additional employees.   |
| Production restart           | Tenaris USA | In February 2022, Tenaris announced that it would reactivate its heat treatment and finishing lines at its Koppel, PA, plant and planned to hire about 75 employees for these lines.  |

| Item        | Firm        | Event   |
|-------------|-------------|---|
| Acquisition | Tenaris USA | In July 2022, Tenaris entered into a definitive agreement to acquire Benteler Steel & Tube Manufacturing Corporation for \$460 million. Benteler is a producer of seamless steel pipe located in Shreveport, LA, with annual capacity of 400,000 metric tons.                         |
| Acquisition | EVRAZ       | In August 2022, Evraz announced that it was beginning the process of soliciting proposals for the acquisition of its North American subsidiaries. Evraz stated that it did not intend to provide any additional information on this process unless or until the process is finalized. |

Sources: Associated Press, Eastern Iowa plant laying off 101 workers, June 18, 2019. <https://www.desmoinesregister.com/story/money/business/2019/06/18/tmk-ipsco-plant-camanche-iowa-laying-off-101-workers/1489369001/>. Tenaris, Tenaris completes acquisition of IPSCO Tubulars from TMK, January 2, 2020. <https://www.tenaris.com/en/newsroom/news-listing/tenaris-completes-acquisition-of-ipsco-tubulars-fr--08317986820>. Tenaris, Form 20-F, 13, 24–25, March 30, 2021. <https://ir.tenaris.com/static-files/48eb844c-9f1a-4978-bb10-f445c893d291>. Action News 5, Blytheville welded pipe mill lays off over 70 employees, January 30, 2020. <https://www.actionnews5.com/2020/01/30/blytheville-welded-pipe-mill-lays-off-over-employees/>. U.S. Steel, United States Steel Corporation takes action to preserve strong long-term future in response to COVID-19 impacts, March 27, 2020. <https://investors.ussteel.com/news/news-details/2020/UNITED-STATES-STEEL-CORPORATION-TAKES-ACTION-TO-PRESERVE-STRONG-LONG-TERM-FUTURE-IN-RESPONSE-TO-COVID-19-IMPACTS/default.aspx>. Tenaris, Tenaris to adjust production, temporarily suspend operations at US facilities, March 19, 2020, <https://www.tenaris.com/en/newsroom/news-listing/tenaris-adjusts-production-suspends-operations-at--26783088120#:~:text=Tenaris%20will%20be%20reducing%20its,suspended%20effective%20March%2031%2C%202020>. Tenaris, Tenaris to adjust workforce at Bay City, TX, seamless plant, May 11, 2020, <https://www.tenaris.com/en/newsroom/news-listing/bay-city-layoffs--02793502820#:~:text=Tenaris%20has%20announced%20it%20will,200%20employees%20at%20the%20plant>. SeAH Steel, SeAH Steel USA new tubing mill facility, November 12, 2020. <http://www.seahsteelusa.com/news/seah-steel-usa-new-tubing-mill-facility/>. Tenaris, Tenaris to scale up industrial activity at its Conroe, TX, plant, March 24, 2021. <https://www.tenaris.com/en/newsroom/news-listing/tenaris-to-scale-up-industrial-activity-at-its-con--22528300321>. Evraz, Unaudited interim financial results for H1 2021, 29, August 5, 2021, [https://www.evraz.com/upload/iblock/081/EVRAZ\\_H1-2021-Interim-report.pdf](https://www.evraz.com/upload/iblock/081/EVRAZ_H1-2021-Interim-report.pdf). Tenaris, Steel production underway at Tenaris's first US melt shop, June 10, 2021, <https://www.tenaris.com/en/newsroom/news-listing/steel-production-underway-at-tenaris-s-first-us-me--10738040121>. Tenaris, Tenaris celebrates reopening of its Pennsylvania manufacturing facilities, September 15, 2021. <https://www.tenaris.com/en/newsroom/news-listing/tenaris-celebrates-reopening-of-its-pennsylvania-m--14980815321>. Tenaris, Tenaris US ramp up continues with restart of Baytown, TX, mill, October 18, 2021. <https://www.tenaris.com/en/newsroom/news-listing/tenaris-us-ramps-up-with-restart-of-baytown-mill--19133441421>. Tenaris, Tenaris boosts production at its welded pipe mill in Arkansas, January 19, 2022. <https://www.tenaris.com/en/newsroom/news-listing/tenaris-boosts-production-at-its-welded-pipe-mill--25561168722>. Tenaris, Tenaris to reactivate heat treatment line at Pennsylvania steel mill, February 8, 2022. <https://www.tenaris.com/en/newsroom/news-listing/tenaris-to-reactivate-heat-treatment-line-at-koppe--00961268322>. Tenaris, Tenaris to acquire Benteler Steel & Tube pipe manufacturing plant in Shreveport, Louisiana, July 7, 2022. <https://ir.tenaris.com/news-releases/news-release-details/tenaris-acquire-benteler-steel-tube-pipe-manufacturing-plant>. Evraz, EVRAZ is launching soliciting of proposals for its North American subsidiaries acquisition, August 10, 2022. <https://www.evraz.com/en/news-and-media/press-releases-and-news/evraz-is-launching-soliciting-of-proposals-for-its-north-american-subsi-diar-ies-acquisition/>.

## U.S. production, capacity, and capacity utilization

Table III-7 and figure III-1 present U.S. mills' production, capacity, and capacity utilization.<sup>4</sup> U.S. mills' capacity decreased by 3.7 percent during 2019-20 then increased by 1.3 percent during 2020-21, decreasing overall by 2.4 percent between 2019 and 2021. Capacity was 9.3 percent higher in January-June 2022 than in January-June 2021.

Most U.S. mills reported lower production in 2021 compared to 2019; however, all U.S. mills reported higher production in January-June 2022 compared to January-June 2021. Production decreased by 48.4 percent during 2019-20<sup>5</sup> then increased by 16.9 percent during 2020-21, decreasing overall by 39.7 percent between 2019 and 2021. The sharp decrease in production from 2019 to 2020 occurred while the effects of the oil and gas downturn and the COVID-19 pandemic on the OCTG industry were reportedly at their highest. U.S. mills' production was 84.4 percent higher during January-June 2022 than in January-June 2021.

U.S. mills' capacity utilization decreased from 44.6 percent in 2019 to 23.9 percent in 2020<sup>6</sup> then increased to 27.6 percent in 2021, decreasing by 17.0 percentage points during 2019-21. Capacity utilization was 16.2 percentage points higher in January-June 2022 (39.7 percent) than in January-June 2021 (23.6 percent).

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<sup>4</sup> See appendix F for firm-level production and processing data.

<sup>5</sup> Demand for OCTG declined in 2019 and early 2020 as a result of sharp decreases in oil and gas prices and rig activity. This decline was further exacerbated by the effects of the COVID-19 pandemic. Conference transcript, pp. 27-28 (Buono).

<sup>6</sup> In its 2021 annual report, U.S. Steel noted that in 2020 it "took actions to adjust {its} footprint by idling certain operations to better align production with customer demand and respond to the impacts from the COVID-19 pandemic." Specifically, the firm reported that in April 2020, it "indefinitely idled the Lone Star Tubular Operations and Lorain Tubular Operations thereby effectively reducing on-line tubular production capacity by 790 thousand and 380 thousand tons, respectively." In April 2020, the Wheeling Machine Products at Hughes Springs, Texas Operations (principally producing tubular couplings) was also idled. All of these facilities remained idle as of June 30, 2022. U.S. Steel 2021 Annual Report, pp. 5, 16, and 49, [https://s26.q4cdn.com/153509673/files/doc\\_downloads/2022/03/2021-Annual-Report.pdf](https://s26.q4cdn.com/153509673/files/doc_downloads/2022/03/2021-Annual-Report.pdf), accessed October 13, 2022; and U.S. Steel Form 10-Q for the Quarterly Period Ended June 30, 2022, p. 28, [https://s26.q4cdn.com/153509673/files/doc\\_financials/2022/q2/As-Filed-form10q220630-with-Exhibits.pdf](https://s26.q4cdn.com/153509673/files/doc_financials/2022/q2/As-Filed-form10q220630-with-Exhibits.pdf), accessed October 13, 2022.

**Table III-7  
OCTG: U.S. mills' capacity, by firm and period**

**Capacity**

Capacity in short tons

| Firm                | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------------|-----------|-----------|-----------|--------------|--------------|
| Axis                | ***       | ***       | ***       | ***          | ***          |
| Benteler            | ***       | ***       | ***       | ***          | ***          |
| Borusan             | ***       | ***       | ***       | ***          | ***          |
| EVRAZ               | ***       | ***       | ***       | ***          | ***          |
| PTC Tubular         | ***       | ***       | ***       | ***          | ***          |
| SeAH Steel          | ***       | ***       | ***       | ***          | ***          |
| Tenaris USA / IPSCO | ***       | ***       | ***       | ***          | ***          |
| Texas Tubular       | ***       | ***       | ***       | ***          | ***          |
| Timken Steel        | ***       | ***       | ***       | ***          | ***          |
| U.S. Steel          | ***       | ***       | ***       | ***          | ***          |
| Vallourec           | ***       | ***       | ***       | ***          | ***          |
| Welded Tube USA     | ***       | ***       | ***       | ***          | ***          |
| Wheatland Tube      | ***       | ***       | ***       | ***          | ***          |
| All firms           | 6,779,396 | 6,528,023 | 6,615,136 | 3,297,806    | 3,605,645    |

Table continued.

**Table III-7 Continued  
OCTG: U.S. mills' production, by firm and period**

**Production**

Production in short tons

| Firm                | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------------|-----------|-----------|-----------|--------------|--------------|
| Axis                | ***       | ***       | ***       | ***          | ***          |
| Benteler            | ***       | ***       | ***       | ***          | ***          |
| Borusan             | ***       | ***       | ***       | ***          | ***          |
| EVRAZ               | ***       | ***       | ***       | ***          | ***          |
| PTC Tubular         | ***       | ***       | ***       | ***          | ***          |
| SeAH Steel          | ***       | ***       | ***       | ***          | ***          |
| Tenaris USA / IPSCO | ***       | ***       | ***       | ***          | ***          |
| Texas Tubular       | ***       | ***       | ***       | ***          | ***          |
| Timken Steel        | ***       | ***       | ***       | ***          | ***          |
| U.S. Steel          | ***       | ***       | ***       | ***          | ***          |
| Vallourec           | ***       | ***       | ***       | ***          | ***          |
| Welded Tube USA     | ***       | ***       | ***       | ***          | ***          |
| Wheatland Tube      | ***       | ***       | ***       | ***          | ***          |
| All firms           | 3,021,579 | 1,559,639 | 1,822,955 | 777,294      | 1,432,956    |

Table continued.

**Table III-7 Continued**  
**OCTG: U.S. mills' capacity utilization, by firm and period**

**Capacity utilization**

Ratios in percent

| Firm                | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------------|------|------|------|--------------|--------------|
| Axis                | ***  | ***  | ***  | ***          | ***          |
| Benteler            | ***  | ***  | ***  | ***          | ***          |
| Borusan             | ***  | ***  | ***  | ***          | ***          |
| EVRAZ               | ***  | ***  | ***  | ***          | ***          |
| PTC Tubular         | ***  | ***  | ***  | ***          | ***          |
| SeAH Steel          | ***  | ***  | ***  | ***          | ***          |
| Tenaris USA / IPSCO | ***  | ***  | ***  | ***          | ***          |
| Texas Tubular       | ***  | ***  | ***  | ***          | ***          |
| Timken Steel        | ***  | ***  | ***  | ***          | ***          |
| U.S. Steel          | ***  | ***  | ***  | ***          | ***          |
| Vallourec           | ***  | ***  | ***  | ***          | ***          |
| Welded Tube USA     | ***  | ***  | ***  | ***          | ***          |
| Wheatland Tube      | ***  | ***  | ***  | ***          | ***          |
| All firms           | 44.6 | 23.9 | 27.6 | 23.6         | 39.7         |

Table continued.

**Table III-7 Continued**  
**OCTG: U.S. mills' share of production, by firm and period**

**Share of production**

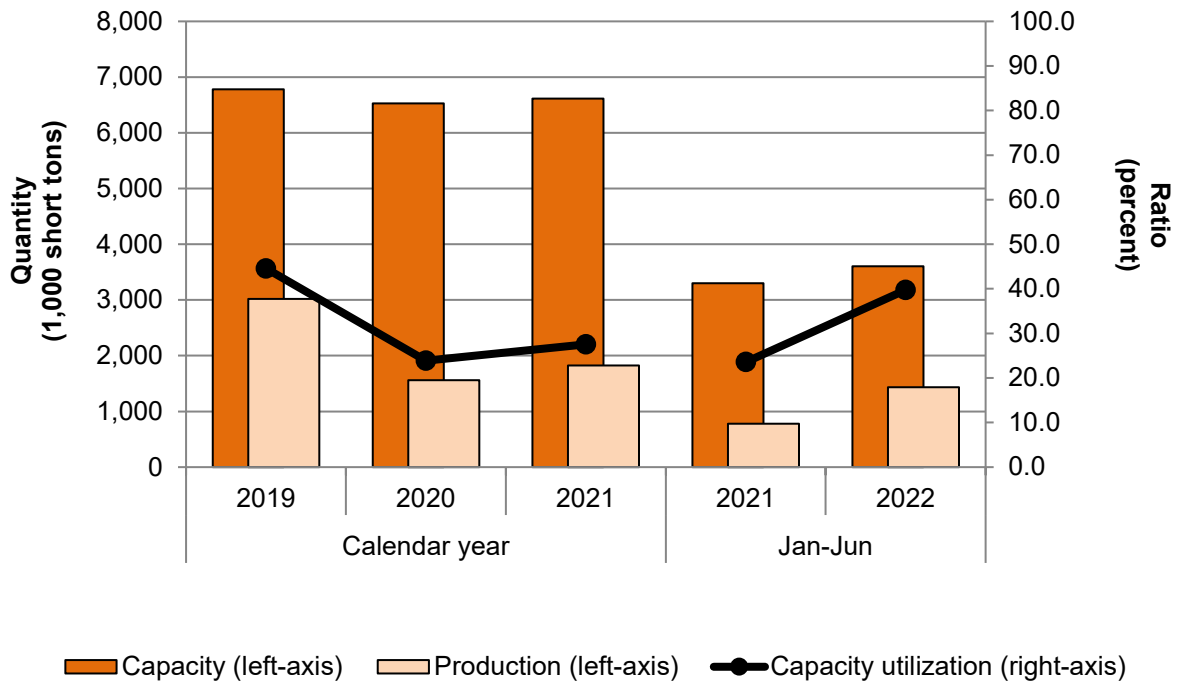
Shares in percent

| Firm                | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------------|-------|-------|-------|--------------|--------------|
| Axis                | ***   | ***   | ***   | ***          | ***          |
| Benteler            | ***   | ***   | ***   | ***          | ***          |
| Borusan             | ***   | ***   | ***   | ***          | ***          |
| EVRAZ               | ***   | ***   | ***   | ***          | ***          |
| PTC Tubular         | ***   | ***   | ***   | ***          | ***          |
| SeAH Steel          | ***   | ***   | ***   | ***          | ***          |
| Tenaris USA / IPSCO | ***   | ***   | ***   | ***          | ***          |
| Texas Tubular       | ***   | ***   | ***   | ***          | ***          |
| Timken Steel        | ***   | ***   | ***   | ***          | ***          |
| U.S. Steel          | ***   | ***   | ***   | ***          | ***          |
| Vallourec           | ***   | ***   | ***   | ***          | ***          |
| Welded Tube USA     | ***   | ***   | ***   | ***          | ***          |
| Wheatland Tube      | ***   | ***   | ***   | ***          | ***          |
| All firms           | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure III-1**  
**OCTG: U.S. mills' production, capacity, and capacity utilization, by period**



Source: Compiled from data submitted in response to Commission questionnaires.

Table III-8 presents U.S. mills' capacity, production, and capacity utilization by product type. Seamless capacity decreased by \*\*\* percent during 2019-21 but was \*\*\* percent higher during January-June 2022 than in January-June 2021. Welded capacity decreased by \*\*\* percent during 2019-21 but was \*\*\* percent higher in January-June 2022 than in January-June 2021. U.S. mills' production of seamless OCTG declined by \*\*\* percent during 2019-21 but was \*\*\* percent higher in January-June 2022 than in January-June 2021. Production of welded OCTG decreased by \*\*\* percent but was \*\*\* percent higher in January-June 2022 than in January-June 2021. Seamless capacity utilization was higher than welded capacity utilization throughout the period for which data were collected. Seamless capacity utilization decreased from \*\*\* percent in 2019 to \*\*\* percent in 2020<sup>7</sup> then increased to \*\*\* percent in 2021 and was higher in January-June 2022 (\*\*\* percent) than in January-June 2021 (\*\*\* percent). Welded capacity utilization decreased from \*\*\* percent in 2019 to \*\*\*

<sup>7</sup> As previously noted, U.S. Steel indefinitely idled the Lorain Tubular Operations (380,000 short tons) in April 2020; the facility remained idle through June 2022.

percent in 2020<sup>8</sup> and to \*\*\* percent in 2021 but was higher in January-June 2022 (\*\*\* percent) than in January-June 2021 (\*\*\* percent). Seamless OCTG’s share of total OCTG production steadily increased during 2019-21, from \*\*\* percent in 2019 to \*\*\* percent in 2020 and to \*\*\* percent in 2021. Seamless OCTG’s share of total OCTG production was \*\*\* percent in January-June 2021 and \*\*\* percent in January-June 2022.<sup>9</sup>

**Table III-8**  
**OCTG: U.S. mills’ capacity, production, and capacity utilization, by product type and period**

Quantity in short tons; Ratios and shares in percent

| Production type               | Measure  | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------|----------|-----------|-----------|-----------|--------------|--------------|
| Seamless capacity             | Quantity | ***       | ***       | ***       | ***          | ***          |
| Welded capacity               | Quantity | ***       | ***       | ***       | ***          | ***          |
| All OCTG capacity             | Quantity | 6,779,396 | 6,528,023 | 6,615,136 | 3,297,806    | 3,605,645    |
| Seamless production           | Quantity | ***       | ***       | ***       | ***          | ***          |
| Welded production             | Quantity | ***       | ***       | ***       | ***          | ***          |
| All OCTG production           | Quantity | 3,021,579 | 1,559,639 | 1,822,955 | 777,294      | 1,432,956    |
| Seamless capacity utilization | Ratio    | ***       | ***       | ***       | ***          | ***          |
| Welded capacity utilization   | Ratio    | ***       | ***       | ***       | ***          | ***          |
| All OCTG capacity utilization | Ratio    | 44.6      | 23.9      | 27.6      | 23.6         | 39.7         |
| Seamless share of capacity    | Share    | ***       | ***       | ***       | ***          | ***          |
| Welded share of capacity      | Share    | ***       | ***       | ***       | ***          | ***          |
| All OCTG share of capacity    | Share    | 100.0     | 100.0     | 100.0     | 100.0        | 100.0        |
| Seamless share of production  | Share    | ***       | ***       | ***       | ***          | ***          |
| Welded share of production    | Share    | ***       | ***       | ***       | ***          | ***          |
| All OCTG share of production  | Share    | 100.0     | 100.0     | 100.0     | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>8</sup> As previously noted, U.S. Steel indefinitely idled the Lone Star Tubular Operations (790,000 short tons) in April 2020; the facility remained idle through June 2022.

<sup>9</sup> Tenaris USA explained that it had halted production of welded OCTG as a result of rapid price increases for hot-rolled coil. Tenaris USA further explained that prices for hot-rolled coil have declined and U.S. production of welded OCTG is trending upwards, although it is still facing challenges in hiring PRWs. Respondents Tenaris USA, Siderca, and TAMSA’s prehearing brief, p. 5.



Table III-9 and figure III-2 present U.S. processors' production, capacity, and capacity utilization, including the processing operations of mills that process OCTG furnished from other sources.<sup>10 11</sup> U.S. processors' capacity decreased by 2.5 percent during 2019-21 and was 20.8 percent higher in January-June 2022 than in January-June 2021.

U.S. processors' production decreased by 49.2 percent during 2019-20 then increased by 49.2 percent during 2020-21, ending 24.2 percent lower in 2021 than in 2019. Production was 34.9 percent higher in January-June 2022 compared to January-June 2021.

Capacity utilization fell from 41.4 percent in 2019 to 21.0 percent in 2020 then increased to 32.2 percent in 2021, decreasing overall by 9.2 percentage points between 2019 and 2021. U.S. processors' capacity utilization was 4.0 percentage points higher in January-June 2022 (38.3 percent) than in January-June 2021 (34.3 percent).

**Table III-9**  
**OCTG: U.S. processors' capacity, by firm and period**

**Capacity**

Capacity in short tons

| Firm                    | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-----------|-----------|-----------|--------------|--------------|
| Benteler                | ***       | ***       | ***       | ***          | ***          |
| Borusan                 | ***       | ***       | ***       | ***          | ***          |
| PTC Tubular             | ***       | ***       | ***       | ***          | ***          |
| RDT                     | ***       | ***       | ***       | ***          | ***          |
| Tejas Tubular           | ***       | ***       | ***       | ***          | ***          |
| All non-toll processors | ***       | ***       | ***       | ***          | ***          |
| RDT                     | ***       | ***       | ***       | ***          | ***          |
| SeAH Steel              | ***       | ***       | ***       | ***          | ***          |
| Splendora               | ***       | ***       | ***       | ***          | ***          |
| Tejas Tubular           | ***       | ***       | ***       | ***          | ***          |
| Texas Steel Conversion  | ***       | ***       | ***       | ***          | ***          |
| Tubular Services        | ***       | ***       | ***       | ***          | ***          |
| Vallourec               | ***       | ***       | ***       | ***          | ***          |
| All toll processors     | ***       | ***       | ***       | ***          | ***          |
| All firms               | 2,027,784 | 2,027,784 | 1,977,784 | 968,892      | 1,170,760    |

Table continued.

<sup>10</sup> See appendix F for firm-level production and processing data.

<sup>11</sup> \*\*\*. Email from \*\*\*, August 10, 2022.

**Table III-9 Continued**  
**OCTG: U.S. processors' production, by firm and period**

**Production**

Production in short tons

| Firm                    | 2019    | 2020    | 2021    | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|---------|---------|---------|--------------|--------------|
| Benteler                | ***     | ***     | ***     | ***          | ***          |
| Borusan                 | ***     | ***     | ***     | ***          | ***          |
| PTC Tubular             | ***     | ***     | ***     | ***          | ***          |
| RDT                     | ***     | ***     | ***     | ***          | ***          |
| Tejas Tubular           | ***     | ***     | ***     | ***          | ***          |
| All non-toll processors | ***     | ***     | ***     | ***          | ***          |
| RDT                     | ***     | ***     | ***     | ***          | ***          |
| SeAH Steel              | ***     | ***     | ***     | ***          | ***          |
| Splendora               | ***     | ***     | ***     | ***          | ***          |
| Tejas Tubular           | ***     | ***     | ***     | ***          | ***          |
| Texas Steel Conversion  | ***     | ***     | ***     | ***          | ***          |
| Tubular Services        | ***     | ***     | ***     | ***          | ***          |
| Vallourec               | ***     | ***     | ***     | ***          | ***          |
| All toll processors     | ***     | ***     | ***     | ***          | ***          |
| All firms               | 840,044 | 426,793 | 636,826 | 332,406      | 448,397      |

Table continued.

**Table III-9 Continued**  
**OCTG: U.S. processors' capacity utilization, by firm and period**

**Capacity utilization**

Ratios in percent

| Firm                    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|------|------|--------------|--------------|
| Benteler                | ***  | ***  | ***  | ***          | ***          |
| Borusan                 | ***  | ***  | ***  | ***          | ***          |
| PTC Tubular             | ***  | ***  | ***  | ***          | ***          |
| RDT                     | ***  | ***  | ***  | ***          | ***          |
| Tejas Tubular           | ***  | ***  | ***  | ***          | ***          |
| All non-toll processors | ***  | ***  | ***  | ***          | ***          |
| RDT                     | ***  | ***  | ***  | ***          | ***          |
| SeAH Steel              | ***  | ***  | ***  | ***          | ***          |
| Splendora               | ***  | ***  | ***  | ***          | ***          |
| Tejas Tubular           | ***  | ***  | ***  | ***          | ***          |
| Texas Steel Conversion  | ***  | ***  | ***  | ***          | ***          |
| Tubular Services        | ***  | ***  | ***  | ***          | ***          |
| Vallourec               | ***  | ***  | ***  | ***          | ***          |
| All toll processors     | ***  | ***  | ***  | ***          | ***          |
| All firms               | 41.4 | 21.0 | 32.2 | 34.3         | 38.3         |

Table continued.

**Table III-9 Continued**  
**OCTG: U.S. processors' share of production, by firm and period**

**Share of production**

Shares in percent

| <b>Firm</b>             | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|-------------|-------------|-------------|---------------------|---------------------|
| Benteler                | ***         | ***         | ***         | ***                 | ***                 |
| Borusan                 | ***         | ***         | ***         | ***                 | ***                 |
| PTC Tubular             | ***         | ***         | ***         | ***                 | ***                 |
| RDT                     | ***         | ***         | ***         | ***                 | ***                 |
| Tejas Tubular           | ***         | ***         | ***         | ***                 | ***                 |
| All non-toll processors | ***         | ***         | ***         | ***                 | ***                 |
| RDT                     | ***         | ***         | ***         | ***                 | ***                 |
| SeAH Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Splendora               | ***         | ***         | ***         | ***                 | ***                 |
| Tejas Tubular           | ***         | ***         | ***         | ***                 | ***                 |
| Texas Steel Conversion  | ***         | ***         | ***         | ***                 | ***                 |
| Tubular Services        | ***         | ***         | ***         | ***                 | ***                 |
| Vallourec               | ***         | ***         | ***         | ***                 | ***                 |
| All toll processors     | ***         | ***         | ***         | ***                 | ***                 |
| All firms               | 100.0       | 100.0       | 100.0       | 100.0               | 100.0               |

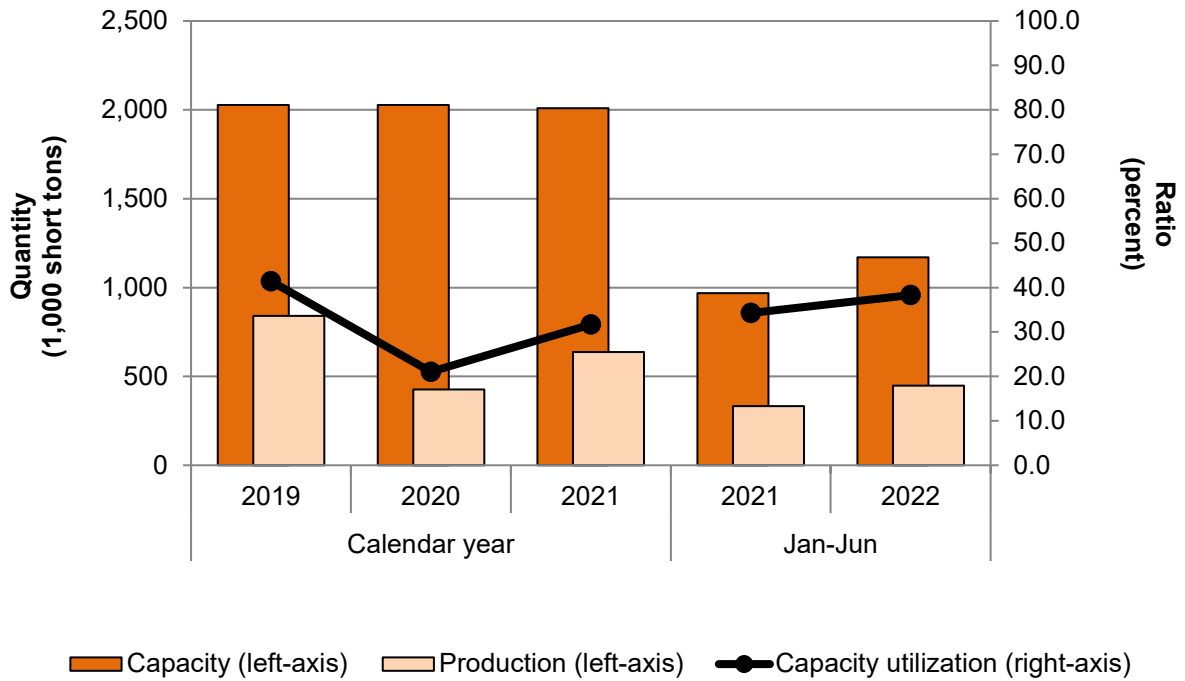
Source: Compiled from data submitted in response to Commission questionnaires.

Note: Commission staff allocated capacity based on production mix for firms that perform both toll and non-toll processing to avoid double counting. Commission staff also adjusted processing capacity in periods where firms reported zero production to reflect zero capacity.

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure III-2**  
**OCTG: U.S. processors' production, capacity, and capacity utilization, by period**



Source: Compiled from data submitted in response to Commission questionnaires.

## Alternative products

Eleven firms reported producing other products on the same equipment used to produce OCTG; these products include \*\*\*. As shown in table III-10, OCTG accounted for \*\*\* percent of U.S. producers' total production on the same equipment as in-scope production during 2021. OCTG's share of total production was higher in January-June 2022 (\*\*\* percent) than in January-June 2021 (\*\*\* percent).

**Table III-10**

**OCTG: U.S. mills' overall capacity and production on the same equipment as in-scope production, by period**

Quantity in short tons; Ratios and shares in percent

| Item                       | Measure  | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|----------|-----------|-----------|-----------|--------------|--------------|
| Overall capacity           | Quantity | 8,514,284 | 8,250,944 | 8,317,944 | 4,100,972    | 4,203,972    |
| OCTG production            | Quantity | 3,021,579 | 1,559,639 | 1,822,955 | 777,294      | 1,432,956    |
| Other production           | Quantity | 984,282   | 588,158   | 557,035   | 267,584      | 312,772      |
| Total production           | Quantity | 4,005,861 | 2,147,797 | 2,379,990 | 1,044,878    | 1,745,728    |
| Total capacity utilization | Ratio    | 47.0      | 26.0      | 28.6      | 25.5         | 41.5         |
| OCTG production            | Share    | ***       | ***       | ***       | ***          | ***          |
| Other production           | Share    | ***       | ***       | ***       | ***          | ***          |
| Total production           | Share    | 100.0     | 100.0     | 100.0     | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. mills' overall capacity and production on the same equipment as in-scope production, by method of production, are presented in table III-11 (seamless production) and table III-12 (welded production). Seamless OCTG's share of total seamless production remained stable during the period for which data were collected, ranging between \*\*\* and \*\*\* percent. Welded OCTG's share of total welded production decreased from \*\*\* percent in 2019 to \*\*\* percent in 2020 and \*\*\* percent in 2021, but was higher in January-June 2022 (\*\*\* percent) than in January-June 2021 (\*\*\* percent).

**Table III-11**  
**Seamless OCTG: U.S. mills' overall capacity and production on the same equipment as in-scope production, by period**

Quantity in short tons; Ratios and shares in percent

| Item                                | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|----------|-------|-------|-------|--------------|--------------|
| Overall seamless capacity           | Quantity | ***   | ***   | ***   | ***          | ***          |
| OCTG seamless production            | Quantity | ***   | ***   | ***   | ***          | ***          |
| Other seamless production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total seamless production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total seamless capacity utilization | Ratio    | ***   | ***   | ***   | ***          | ***          |
| OCTG seamless production            | Share    | ***   | ***   | ***   | ***          | ***          |
| Other seamless production           | Share    | ***   | ***   | ***   | ***          | ***          |
| Total seamless production           | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table III-12**  
**Welded OCTG: U.S. mills' overall capacity and production on the same equipment as in-scope production, by period**

Quantity in short tons; Ratios and shares in percent

| Item                              | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------------|----------|-------|-------|-------|--------------|--------------|
| Overall welded capacity           | Quantity | ***   | ***   | ***   | ***          | ***          |
| OCTG welded production            | Quantity | ***   | ***   | ***   | ***          | ***          |
| Other welded production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total welded production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total welded capacity utilization | Ratio    | ***   | ***   | ***   | ***          | ***          |
| OCTG welded production            | Share    | ***   | ***   | ***   | ***          | ***          |
| Other welded production           | Share    | ***   | ***   | ***   | ***          | ***          |
| Total welded production           | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

## U.S. producers' U.S. shipments and exports

Table III-13 presents U.S. mills' U.S. shipments, export shipments, and total shipments. U.S. mills' shipments of OCTG were \*\*\* in the domestic market during the period for which data were collected; \*\*\* of total shipments by quantity in any given period were destined for export markets.<sup>12</sup>

**Table III-13**  
**OCTG: U.S. mills' shipments, by destination and period**

Quantity in short tons; Value in 1,000 dollars; Unit value in dollars per short ton; Shares in percent

| Item             | Measure           | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------|-------------------|-----------|-----------|-----------|--------------|--------------|
| U.S. shipments   | Quantity          | 2,983,013 | 1,601,197 | 1,697,888 | 719,001      | 1,241,472    |
| Export shipments | Quantity          | ***       | ***       | ***       | ***          | ***          |
| Total shipments  | Quantity          | ***       | ***       | ***       | ***          | ***          |
| U.S. shipments   | Value             | 4,309,510 | 1,980,332 | 2,736,274 | 989,625      | 2,944,125    |
| Export shipments | Value             | ***       | ***       | ***       | ***          | ***          |
| Total shipments  | Value             | ***       | ***       | ***       | ***          | ***          |
| U.S. shipments   | Unit value        | 1,445     | 1,237     | 1,612     | 1,376        | 2,371        |
| Export shipments | Unit value        | ***       | ***       | ***       | ***          | ***          |
| Total shipments  | Unit value        | ***       | ***       | ***       | ***          | ***          |
| U.S. shipments   | Share of quantity | ***       | ***       | ***       | ***          | ***          |
| Export shipments | Share of quantity | ***       | ***       | ***       | ***          | ***          |
| Total shipments  | Share of quantity | 100.0     | 100.0     | 100.0     | 100.0        | 100.0        |
| U.S. shipments   | Share of value    | ***       | ***       | ***       | ***          | ***          |
| Export shipments | Share of value    | ***       | ***       | ***       | ***          | ***          |
| Total shipments  | Share of value    | 100.0     | 100.0     | 100.0     | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>12</sup> \*\*\*. \*\*\*'s U.S. producer questionnaire response, II-21.

No U.S. mill reported internal consumption of OCTG during the period for which data were collected. Transfers to related parties within the United States (i.e., excluding shipments reported as exports) accounted for \*\*\* percent of total U.S. mills' U.S. shipments between January 2019 and June 2022. These transfers to related parties were primarily attributable to \*\*\* and reflect transactions made to related distributors.

Table III-14 presents U.S. non-toll processors' U.S. shipments, export shipments, and total shipments. U.S. non-toll processors' shipments of OCTG were \*\*\* in the domestic market during the period for which data were collected; \*\*\* of total shipments by volume in any given period were destined for export markets.

**Table III-14**  
**OCTG: U.S. non-toll processors' shipments, by destination and period**

Quantity in short tons; Value in 1,000 dollars; Unit value in dollars per short ton; Shares in percent

| Item             | Measure           | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------|-------------------|-------|-------|-------|--------------|--------------|
| U.S. shipments   | Quantity          | ***   | ***   | ***   | ***          | ***          |
| Export shipments | Quantity          | ***   | ***   | ***   | ***          | ***          |
| Total shipments  | Quantity          | ***   | ***   | ***   | ***          | ***          |
| U.S. shipments   | Value             | ***   | ***   | ***   | ***          | ***          |
| Export shipments | Value             | ***   | ***   | ***   | ***          | ***          |
| Total shipments  | Value             | ***   | ***   | ***   | ***          | ***          |
| U.S. shipments   | Unit value        | ***   | ***   | ***   | ***          | ***          |
| Export shipments | Unit value        | ***   | ***   | ***   | ***          | ***          |
| Total shipments  | Unit value        | ***   | ***   | ***   | ***          | ***          |
| U.S. shipments   | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| Export shipments | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| Total shipments  | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| U.S. shipments   | Share of value    | ***   | ***   | ***   | ***          | ***          |
| Export shipments | Share of value    | ***   | ***   | ***   | ***          | ***          |
| Total shipments  | Share of value    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-15 presents U.S. toll processors' U.S. shipments (specifically returns to the tolllee). U.S. toll processors' revenue from U.S. importers accounted for more than \*\*\* of total revenue during the period for which data were collected.



**Table III-15**  
**OCTG: U.S. toll processors' shipments (returns), by destination and period**

Quantity in short tons; Value in 1,000 dollars; Unit value in dollars per short ton; Shares in percent

| Item                            | Measure           | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------------------------|-------------------|-------|-------|-------|--------------|--------------|
| For U.S. mills                  | Quantity          | ***   | ***   | ***   | ***          | ***          |
| For U.S. importers              | Quantity          | ***   | ***   | ***   | ***          | ***          |
| For other customers             | Quantity          | ***   | ***   | ***   | ***          | ***          |
| All shipments returned to tolee | Quantity          | ***   | ***   | ***   | ***          | ***          |
| For U.S. mills                  | Value             | ***   | ***   | ***   | ***          | ***          |
| For U.S. importers              | Value             | ***   | ***   | ***   | ***          | ***          |
| For other customers             | Value             | ***   | ***   | ***   | ***          | ***          |
| All shipments returned to tolee | Value             | ***   | ***   | ***   | ***          | ***          |
| For U.S. mills                  | Unit value        | ***   | ***   | ***   | ***          | ***          |
| For U.S. importers              | Unit value        | ***   | ***   | ***   | ***          | ***          |
| For other customers             | Unit value        | ***   | ***   | ***   | ***          | ***          |
| All shipments returned to tolee | Unit value        | ***   | ***   | ***   | ***          | ***          |
| For U.S. mills                  | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| For U.S. importers              | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| For other customers             | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| All shipments returned to tolee | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| For U.S. mills                  | Share of value    | ***   | ***   | ***   | ***          | ***          |
| For U.S. importers              | Share of value    | ***   | ***   | ***   | ***          | ***          |
| For other customers             | Share of value    | ***   | ***   | ***   | ***          | ***          |
| All shipments returned to tolee | Share of value    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-16 presents U.S. producers' U.S. shipments for use in apparent U.S. consumption. As detailed in the table note, Commission staff adjusted the value of U.S. producers' U.S. shipments to avoid double counting the value of imported OCTG that is further processed in the United States already reported as an import.

**Table III-16**  
**OCTG: U.S. producers' U.S. shipments for use in apparent U.S. consumption, by period**

Quantity in short tons; Value in 1,000 dollars

| Item                                   | Measure  | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|--|----------|-----------|-----------|-----------|--------------|--------------|
| U.S. shipments                         | Quantity | 2,983,013 | 1,601,197 | 1,697,888 | 719,001      | 1,241,472    |
| U.S. shipments mills only              | Value    | 4,309,510 | 1,980,332 | 2,736,274 | 989,625      | 2,944,125    |
| U.S. shipments value added to domestic | Value    | 1,074     | 901       | ---       | ---          | ---          |
| U.S. shipments fully domestic          | Value    | 4,310,584 | 1,981,233 | 2,736,274 | 989,625      | 2,944,125    |
| U.S. shipments value added to imports  | Value    | 187,430   | 93,248    | 149,553   | 76,726       | 119,453      |
| U.S. shipments total                   | Value    | 4,498,014 | 2,074,481 | 2,885,827 | 1,066,351    | 3,063,578    |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Quantity for U.S. producers' U.S. shipments reflects mills' U.S. shipment quantities. Value for U.S. producers' U.S. shipments reflects OCTG products sold in the United States from domestically manufactured OCTG (including the value added by U.S. non-toll processors to domestic OCTG), as well as the incremental value added by U.S. processors to imported OCTG. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import.

## U.S. producers' inventories<sup>13</sup>

Table III-17 presents U.S. mills' end-of-period inventories and the ratio of these inventories to U.S. mills' production, U.S. shipments, and total shipments. End-of-period inventories decreased by 55.6 percent during 2019-20 then increased by 29.5 percent during 2020-21, ending 42.5 percent lower in 2021 than in 2019. U.S. mills' end-of-period inventories were 79.4 percent higher in January-June 2022 than in January-June 2021.

**Table III-17**  
**OCTG: U.S. mills' inventories and their ratio to select items, by period**

Quantity in short tons; Ratios in percent

| Item                               | 2019    | 2020    | 2021    | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------------------|---------|---------|---------|--------------|--------------|
| End-of-period inventory quantity   | 396,431 | 176,106 | 228,092 | 192,099      | 344,664      |
| Inventory ratio to U.S. production | 13.1    | 11.3    | 12.5    | 12.4         | 12.0         |
| Inventory ratio to U.S. shipments  | 13.3    | 11.0    | 13.4    | 13.4         | 13.9         |
| Inventory ratio to total shipments | ***     | ***     | ***     | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>13</sup> Inventories of OCTG are principally held by distributors. Conference transcript, pp. 108, 200 (Tait and Curá).

Table III-18 presents U.S. non-toll processors' end-of-period inventories and the ratio of these inventories to U.S. non-toll processors' production, U.S. shipments, and total shipments. End-of-period inventories decreased by \*\*\* percent during 2019-20 then further decreased by \*\*\* percent during 2020-21, ending \*\*\* percent lower in 2021 than in 2019. U.S. non-toll processors' end-of-period inventories were \*\*\* percent lower in January-June 2022 than in January-June 2021.

**Table III-18**  
**OCTG: U.S. non-toll processors' inventories and their ratio to select items, by period**

Quantity in short tons; Ratios in percent

| Item                               | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------------------|------|------|------|--------------|--------------|
| End-of-period inventory quantity   | ***  | ***  | ***  | ***          | ***          |
| Inventory ratio to U.S. production | ***  | ***  | ***  | ***          | ***          |
| Inventory ratio to U.S. shipments  | ***  | ***  | ***  | ***          | ***          |
| Inventory ratio to total shipments | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

## U.S. producers' imports from subject sources

U.S. producer \*\*\* reported importing OCTG from \*\*. U.S. producer \*\*\* reported imports of OCTG from \*\*. U.S. producer \*\*\* reported imports of OCTG from \*\*. U.S. producers' imports of OCTG are presented in tables III-19 through III-21 and their reasons for importing are presented in table III-22.

**Table III-19**  
**OCTG: \*\*s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; Ratios in percent

| Item                                    | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|----------|------|------|------|--------------|--------------|
| U.S. mill production                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| Imports from **                         | Quantity | ***  | ***  | ***  | ***          | ***          |
| Imports from ** to U.S. mill production | Ratio    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table III-20****OCTG: \*\*\*'s U.S. production, affiliated U.S. importer \*\*\*'s subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; Ratios in percent

| Item                                     | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|--|----------|------|------|------|--------------|--------------|
| U.S. mill production                     | Quantity | ***  | ***  | ***  | ***          | ***          |
| U.S. toll production                     | Quantity | ***  | ***  | ***  | ***          | ***          |
| All U.S. production                      | Quantity | ***  | ***  | ***  | ***          | ***          |
| Imports from ***                         | Quantity | ***  | ***  | ***  | ***          | ***          |
| Imports from *** to U.S. mill production | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Imports from *** to U.S. toll production | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Imports from *** to all U.S. production  | Ratio    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table III-21****OCTG: \*\*\*'s U.S. production, affiliated U.S. importer \*\*\*'s subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; Ratios in percent

| Item   | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|--|----------|------|------|------|--------------|--------------|
| U.S. mill production                                 | Quantity | ***  | ***  | ***  | ***          | ***          |
| Imports from ***                                     | Quantity | ***  | ***  | ***  | ***          | ***          |
| Imports from ***                                     | Quantity | ***  | ***  | ***  | ***          | ***          |
| Imports from subject sources                         | Quantity | ***  | ***  | ***  | ***          | ***          |
| Imports from *** to U.S. mill production             | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Imports from *** to U.S. mill production             | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Imports from subject sources to U.S. mill production | Ratio    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table III-22**

**OCTG: U.S. producers' reasons for importing, by firm**

| Item                       | Narrative response on reasons for importing |
|----------------------------|---|
| ***'s reason for importing | ***   |
| ***'s reason for importing | ***   |
| ***'s reason for importing | ***   |

Source: Compiled from data submitted in response to Commission questionnaires.

**U.S. producers' purchases of imports from subject sources**

\*\*\* reported purchases of OCTG imported from \*\*\*. \*\*\* reported purchases \*\*\* of OCTG imported from \*\*\*. These purchases of OCTG imported from subject sources are presented in tables III-23 and III-24 and the firms' reasons for purchasing are presented in table III-25.

**Table III-23**

**OCTG: \*\*\*'s purchases of imports from subject sources, by period**

Quantity in short tons; Ratios in percent

| Item   | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|--|----------|------|------|------|--------------|--------------|
| ***'s U.S. purchases of imports from *** (***)   | Quantity | ***  | ***  | ***  | ***          | ***          |
| Overall U.S. imports from ***                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| Producer's purchases to overall imports from *** | Ratio    | ***  | ***  | ***  | ***          | ***          |
| ***'s U.S. purchases of imports from *** (***)   | Quantity | ***  | ***  | ***  | ***          | ***          |
| Overall U.S. imports from ***                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| Producer's purchases to overall imports from *** | Ratio    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports quantities are based on the imports for consumption data series.

Note: \*\*\*. \*\*\*'s U.S. producer questionnaire response, II-19.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table III-24****OCTG: \*\*\*'s purchases of imports from subject sources, by period**

Quantity in short tons; Ratios in percent

| Item   | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|--|----------|------|------|------|--------------|--------------|
| ***'s U.S. purchases of imports from *** (***)   | Quantity | ***  | ***  | ***  | ***          | ***          |
| U.S. importer ***'s U.S. imports from ***        | Quantity | ***  | ***  | ***  | ***          | ***          |
| Producer's purchases to importer's imports (***) | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Overall U.S. imports from ***                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| Producer's purchases to overall imports from *** | Ratio    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports quantities are based on the imports for consumption data series.

Note: \*\*\* reported purchases of OCTG from \*\*\* by \*\*\*.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table III-25****OCTG: U.S. producers' reasons for purchasing, by firm**

| Item                        | Narrative response on purchases |
|-----------------------------|---------------------------------|
| ***'s reason for purchasing | ***                             |
| ***'s reason for purchasing | ***                             |

Source: Compiled from data submitted in response to Commission questionnaires.

## U.S. employment, wages, and productivity

Employment-related data for U.S. mills are presented in table III-26 and for U.S. processors in table III-27.

**Table III-26**  
**OCTG: U.S. mills' employment related data, by period**

| Item   | 2019    | 2020    | 2021    | Jan-Jun 2021 | Jan-Jun 2022 |
|--|---------|---------|---------|--------------|--------------|
| Production and related workers (PRWs) (number) | 6,437   | 3,244   | 3,282   | 2,771        | 4,231        |
| Total hours worked (1,000 hours)               | 15,015  | 7,378   | 7,183   | 3,395        | 5,424        |
| Hours worked per PRW (hours)                   | 2,333   | 2,274   | 2,189   | 1,225        | 1,282        |
| Wages paid (\$1,000)                           | 539,174 | 279,265 | 299,854 | 127,424      | 222,179      |
| Hourly wages (dollars per hour)                | \$35.91 | \$37.85 | \$41.74 | \$37.53      | \$40.96      |
| Productivity (short tons per 1,000 hours)      | 201.2   | 211.4   | 253.8   | 229.0        | 264.2        |
| Unit labor costs (dollars per short ton)       | \$178   | \$179   | \$164   | \$164        | \$155        |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table III-27**  
**OCTG: U.S. processors' employment related data, by period**

| Item   | 2019    | 2020    | 2021    | Jan-Jun 2021 | Jan-Jun 2022 |
|--|---------|---------|---------|--------------|--------------|
| Production and related workers (PRWs) (number) | 2,144   | 1,484   | 1,497   | 1,357        | 1,887        |
| Total hours worked (1,000 hours)               | 6,117   | 3,655   | 4,096   | 1,912        | 2,864        |
| Hours worked per PRW (hours)                   | 2,853   | 2,463   | 2,736   | 1,409        | 1,518        |
| Wages paid (\$1,000)                           | 107,593 | 68,427  | 78,147  | 37,678       | 54,655       |
| Hourly wages (dollars per hour)                | \$17.59 | \$18.72 | \$19.08 | \$19.71      | \$19.08      |
| Productivity (short tons per 1,000 hours)      | 137.3   | 116.8   | 155.5   | 173.9        | 156.6        |
| Unit labor costs (dollars per short ton)       | \$128   | \$160   | \$123   | \$113        | \$122        |

Source: Compiled from data submitted in response to Commission questionnaires.

Combined employment-related data for all U.S. producers are presented in table III-28. U.S. producers' production and related workers ("PRWs") decreased by 44.3 percent during 2019-21 but were 48.2 percent higher during January-June 2022 than in January-June 2021. Hours worked decreased by 46.6 percent between 2019 and 2021 but were 56.2 percent higher in January-June 2022 than in January-June 2021. Wages paid decreased by 41.6 percent during 2019-21 and hours worked per PRW decreased by 4.2 percent. Wages paid and hours worked per PRW were both higher in January-June 2022 than in January-June 2021. Hourly wages increased by 9.5 percent during 2019-21 and were 7.4 percent higher in January-June 2022 than in January-June 2021.



**Table III-28****OCTG: U.S. producers' combined employment related data, by period**

| Item   | 2019    | 2020    | 2021    | Jan-Jun 2021 | Jan-Jun 2022 |
|--|---------|---------|---------|--------------|--------------|
| Production and related workers (PRWs) (number) | 8,581   | 4,728   | 4,779   | 4,128        | 6,118        |
| Total hours worked (1,000 hours)               | 21,132  | 11,033  | 11,279  | 5,307        | 8,288        |
| Hours worked per PRW (hours)                   | 2,463   | 2,334   | 2,360   | 1,286        | 1,355        |
| Wages paid (\$1,000)                           | 646,767 | 347,692 | 378,001 | 165,102      | 276,834      |
| Hourly wages (dollars per hour)                | \$30.61 | \$31.51 | \$33.51 | \$31.11      | \$33.40      |

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-29 presents U.S. producers' PRWs on a firm-level basis.

**Table III-29****OCTG: Firm-by-firm U.S. producers' production-related workers (PRWs), by period**

PRWs in average number

| Firm                | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------------|-------|-------|-------|--------------|--------------|
| Axis                | ***   | ***   | ***   | ***          | ***          |
| Benteler            | ***   | ***   | ***   | ***          | ***          |
| Borusan             | ***   | ***   | ***   | ***          | ***          |
| EVRAZ               | ***   | ***   | ***   | ***          | ***          |
| PTC Tubular         | ***   | ***   | ***   | ***          | ***          |
| SeAH Steel          | ***   | ***   | ***   | ***          | ***          |
| Tenaris USA / IPSCO | ***   | ***   | ***   | ***          | ***          |
| Texas Tubular       | ***   | ***   | ***   | ***          | ***          |
| Timken Steel        | ***   | ***   | ***   | ***          | ***          |
| U.S. Steel          | ***   | ***   | ***   | ***          | ***          |
| Vallourec           | ***   | ***   | ***   | ***          | ***          |
| Welded Tube USA     | ***   | ***   | ***   | ***          | ***          |
| Wheatland Tube      | ***   | ***   | ***   | ***          | ***          |
| All mills           | 6,437 | 3,244 | 3,282 | 2,771        | 4,231        |
| All processors      | 2,144 | 1,484 | 1,497 | 1,357        | 1,887        |
| All firms           | 8,581 | 4,728 | 4,779 | 4,128        | 6,118        |

Table continued.

**Table III-29 Continued**  
**OCTG: Firm-by-firm U.S. producers' production-related workers (PRWs), by period**

Share of PRWs in percent

| <b>Firm</b>         | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun<br/>2021</b> | <b>Jan-Jun<br/>2022</b> |
|---------------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Axis                | ***         | ***         | ***         | ***                     | ***                     |
| Benteler            | ***         | ***         | ***         | ***                     | ***                     |
| Borusan             | ***         | ***         | ***         | ***                     | ***                     |
| EVRAZ               | ***         | ***         | ***         | ***                     | ***                     |
| PTC Tubular         | ***         | ***         | ***         | ***                     | ***                     |
| SeAH Steel          | ***         | ***         | ***         | ***                     | ***                     |
| Tenaris USA / IPSCO | ***         | ***         | ***         | ***                     | ***                     |
| Texas Tubular       | ***         | ***         | ***         | ***                     | ***                     |
| Timken Steel        | ***         | ***         | ***         | ***                     | ***                     |
| U.S. Steel          | ***         | ***         | ***         | ***                     | ***                     |
| Vallourec           | ***         | ***         | ***         | ***                     | ***                     |
| Welded Tube USA     | ***         | ***         | ***         | ***                     | ***                     |
| Wheatland Tube      | ***         | ***         | ***         | ***                     | ***                     |
| All mills           | ***         | ***         | ***         | ***                     | ***                     |
| All processors      | ***         | ***         | ***         | ***                     | ***                     |
| All firms           | 100.0       | 100.0       | 100.0       | 100.0                   | 100.0                   |

Source: Compiled from data submitted in response to Commission questionnaires.

## Part IV: U.S. imports, apparent U.S. consumption, and market shares

### U.S. importers

The Commission issued importer questionnaires to 46 firms believed to be importers of OCTG, as well as to all U.S. producers of OCTG.<sup>1</sup> Usable questionnaire responses were received from 27 companies, representing \*\*\* percent of subject imports from Argentina, Mexico, Russia, and South Korea (subject) and 75.5 percent of total U.S. imports in 2021 under HTS subheadings 7304.29, 7305.20, and 7306.29.<sup>2</sup> Firms responding to the Commission's questionnaire accounted for the following shares of subject imports of OCTG by source during 2021, based on official Commerce import statistics—Argentina, \*\*\*; Mexico, \*\*\* percent; and Russia, \*\*\* percent. On the other hand, responding U.S. importers accounted for \*\*\* percent of subject imports from South Korea (\*\*\*) during 2021 and \*\*\* percent of nonsubject imports. In light of the questionnaire coverage, import data presented in this report, unless otherwise noted, are based on official Commerce import statistics, with adjustments made by Commission staff \*\*\*.<sup>3</sup>

Table IV-1 lists all responding U.S. importers of OCTG from Argentina, Mexico, Russia, South Korea (subject), their locations, and their shares of U.S. imports by source, in 2021. Table IV-2 presents equivalent information with respect to aggregated imports from subject sources, nonsubject sources, and all sources.

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<sup>1</sup> The Commission issued importer questionnaires to those firms identified in the petition, along with firms that, based on a review of data from third-party sources, may have accounted for more than one percent of total imports under HTS subheadings 7304.29, 7305.20, and 7306.29 during January 2019 through June 2022.

Seven firms (\*\*\*) certified that they have not imported OCTG from any country at any time since January 1, 2019.

<sup>2</sup> The Commission also received importer questionnaire responses from \*\*\*. These firms confirmed that they were not the importer of record and thus are not included in the importer dataset. Emails from \*\*\*, August 16, 2022 and \*\*\*, August 11, 2022.

<sup>3</sup> Official Commerce import statistics presented in this report do not include in-scope coupling stock, which enter under HTS statistical reporting numbers that include primarily out-of-scope products. Based on responses to the Commission's importer questionnaire, coupling stock accounted for approximately \*\*\* percent of total OCTG imports between January 2019 and June 2022. Responding firms reported the following quantities of coupling stock imports—\*\*\* short tons in 2019, \*\*\* short tons in 2020, \*\*\* short tons in 2021, \*\*\* short tons in January-June 2021, and \*\*\* short tons in January-June 2022.

**Table IV-1**  
**OCTG: U.S. importers, their headquarters, and share of subject imports by source, 2021**

Shares in percent

| Firm                  | Headquarters          | Argentina | Mexico | Russia | South Korea, subject |
|-----------------------|-----------------------|-----------|--------|--------|----------------------|
| Arvedi                | Cremona, Italy        | ***       | ***    | ***    | ***                  |
| Atlas                 | Robstown, TX          | ***       | ***    | ***    | ***                  |
| Axis                  | Bryan, TX             | ***       | ***    | ***    | ***                  |
| Baowin                | Houston, TX           | ***       | ***    | ***    | ***                  |
| Borusan               | Baytown, TX           | ***       | ***    | ***    | ***                  |
| CPW America           | Houston, TX           | ***       | ***    | ***    | ***                  |
| EVRAZ                 | Chicago, IL           | ***       | ***    | ***    | ***                  |
| Hyundai Steel USA     | Houston, TX           | ***       | ***    | ***    | ***                  |
| Interpipe             | Houston, TX           | ***       | ***    | ***    | ***                  |
| NOV                   | Houston, TX           | ***       | ***    | ***    | ***                  |
| OFS                   | Houston, TX           | ***       | ***    | ***    | ***                  |
| Okaya                 | Arlington Heights, IL | ***       | ***    | ***    | ***                  |
| OMK                   | Houston, TX           | ***       | ***    | ***    | ***                  |
| Optima                | Pleasant Hill, CA     | ***       | ***    | ***    | ***                  |
| RDT                   | Beasley, TX           | ***       | ***    | ***    | ***                  |
| SeAH Steel            | Irvine, CA            | ***       | ***    | ***    | ***                  |
| Sim-Tex               | Waller, TX            | ***       | ***    | ***    | ***                  |
| Sumitomo              | Houston, TX           | ***       | ***    | ***    | ***                  |
| Tenaris Global        | Houston, TX           | ***       | ***    | ***    | ***                  |
| Thyssenkrupp          | Southfield, MI        | ***       | ***    | ***    | ***                  |
| TMK Overseas          | Houston, TX           | ***       | ***    | ***    | ***                  |
| TMK-ARTROM            | Slatina, Romania      | ***       | ***    | ***    | ***                  |
| Tubos Reunidos        | Houston, TX           | ***       | ***    | ***    | ***                  |
| Vallourec STAR        | Houston, TX           | ***       | ***    | ***    | ***                  |
| Vallourec USA         | Houston, TX           | ***       | ***    | ***    | ***                  |
| Voestalpine           | Houston, TX           | ***       | ***    | ***    | ***                  |
| Welded Tube of Canada | Concord, Canada       | ***       | ***    | ***    | ***                  |
| All firms             | Various               | 100.0     | 100.0  | 100.0  | 100.0                |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table IV-2**  
**OCTG: U.S. importers, their headquarters, and share of total imports by source, 2021**

Shares in percent

| Firm                  | Headquarters          | Subject sources | Nonsubject sources | All import sources |
|-----------------------|-----------------------|-----------------|--------------------|--------------------|
| Arvedi                | Cremona, Italy        | ***             | ***                | ***                |
| Atlas                 | Robstown, TX          | ***             | ***                | ***                |
| Axis                  | Bryan, TX             | ***             | ***                | ***                |
| Baowin                | Houston, TX           | ***             | ***                | ***                |
| Borusan               | Baytown, TX           | ***             | ***                | ***                |
| CPW America           | Houston, TX           | ***             | ***                | ***                |
| EVRAZ                 | Chicago, IL           | ***             | ***                | ***                |
| Hyundai Steel USA     | Houston, TX           | ***             | ***                | ***                |
| Interpipe             | Houston, TX           | ***             | ***                | ***                |
| NOV                   | Houston, TX           | ***             | ***                | ***                |
| OFS                   | Houston, TX           | ***             | ***                | ***                |
| Okaya                 | Arlington Heights, IL | ***             | ***                | ***                |
| OMK                   | Houston, TX           | ***             | ***                | ***                |
| Optima                | Pleasant Hill, CA     | ***             | ***                | ***                |
| RDT                   | Beasley, TX           | ***             | ***                | ***                |
| SeAH Steel            | Irvine, CA            | ***             | ***                | ***                |
| Sim-Tex               | Waller, TX            | ***             | ***                | ***                |
| Sumitomo              | Houston, TX           | ***             | ***                | ***                |
| Tenaris Global        | Houston, TX           | ***             | ***                | ***                |
| Thyssenkrupp          | Southfield, MI        | ***             | ***                | ***                |
| TMK Overseas          | Houston, TX           | ***             | ***                | ***                |
| TMK-ARTROM            | Slatina, Romania      | ***             | ***                | ***                |
| Tubos Reunidos        | Houston, TX           | ***             | ***                | ***                |
| Vallourec STAR        | Houston, TX           | ***             | ***                | ***                |
| Vallourec USA         | Houston, TX           | ***             | ***                | ***                |
| Voestalpine           | Houston, TX           | ***             | ***                | ***                |
| Welded Tube of Canada | Concord, Canada       | ***             | ***                | ***                |
| All firms             | Various               | 100.0           | 100.0              | 100.0              |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “--”.

## U.S. imports

Table IV-3 and figure IV-1 present data for U.S. imports of OCTG from Argentina, Mexico, Russia, South Korea, and all other sources. Total imports decreased by 20.8 percent during 2019-21 but were 68.5 percent higher in January-June 2022 than in January-June 2021. Subject imports decreased by \*\*\* percent during 2019-20 but then increased by \*\*\* percent during 2020-21, increasing overall by \*\*\* percent between 2019 and 2021. Nonsubject imports decreased by \*\*\* percent during 2019-20 but then increased by \*\*\* percent during 2020-21, ending \*\*\* percent lower in 2021 than in 2019. Subject imports were \*\*\* percent higher in January-June 2022 than in January-June 2021 and nonsubject imports were \*\*\* percent higher over the same comparison. Leading sources of nonsubject imports include Austria, Canada, \*\*\*, and Taiwan.

During 2019-21, imports from Argentina increased by 0.1 percent, imports from Mexico increased by 60.8 percent, and imports from Russia decreased by 31.2 percent. Imports from Mexico and Russia were higher in January-June 2022 than in January-June 2021, while imports from Argentina were lower. Subject imports from South Korea increased by \*\*\* percent during 2019-21 and were \*\*\* percent higher in January-June 2022 than in January-June 2021.

The average unit values (“AUVs”) of imports from both subject and nonsubject sources increased between 2019 and 2021, by \*\*\* percent and \*\*\* percent, respectively. Subject import AUVs were \*\*\* percent higher in January-June 2022 than in January-June 2021 and nonsubject import AUVs were \*\*\* percent higher over the same comparison.

As a share of total imports, subject imports increased by \*\*\* percentage points during 2019-21 but were \*\*\* percentage points lower in January-June 2022 than in January-June 2021.

**Table IV-3**  
**OCTG: U.S. imports, by source and period**

Quantity in short tons; Value in 1,000 dollars; Unit value in dollars per short ton

| Source                  | Measure    | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------------|-----------|-----------|-----------|--------------|--------------|
| Argentina               | Quantity   | 162,875   | 16,735    | 162,640   | 81,015       | 59,593       |
| Mexico                  | Quantity   | 214,197   | 164,874   | 344,432   | 127,777      | 132,755      |
| Russia                  | Quantity   | 215,339   | 49,340    | 148,084   | 58,081       | 81,321       |
| South Korea, subject    | Quantity   | ***       | ***       | ***       | ***          | ***          |
| Subject sources         | Quantity   | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject | Quantity   | ***       | ***       | ***       | ***          | ***          |
| All other sources       | Quantity   | 1,238,082 | 517,438   | 644,483   | 217,784      | 633,608      |
| Nonsubject sources      | Quantity   | ***       | ***       | ***       | ***          | ***          |
| All import sources      | Quantity   | 2,280,575 | 1,049,735 | 1,806,970 | 702,322      | 1,183,285    |
| Argentina               | Value      | 216,803   | 20,331    | 205,993   | 79,842       | 110,312      |
| Mexico                  | Value      | 350,408   | 222,982   | 488,307   | 153,250      | 273,771      |
| Russia                  | Value      | 230,773   | 40,376    | 143,613   | 42,669       | 103,597      |
| South Korea, subject    | Value      | ***       | ***       | ***       | ***          | ***          |
| Subject sources         | Value      | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject | Value      | ***       | ***       | ***       | ***          | ***          |
| All other sources       | Value      | 1,442,969 | 555,561   | 843,183   | 262,873      | 1,083,098    |
| Nonsubject sources      | Value      | ***       | ***       | ***       | ***          | ***          |
| All import sources      | Value      | 2,639,123 | 1,048,596 | 2,231,540 | 716,783      | 2,020,588    |
| Argentina               | Unit value | 1,331     | 1,215     | 1,267     | 986          | 1,851        |
| Mexico                  | Unit value | 1,636     | 1,352     | 1,418     | 1,199        | 2,062        |
| Russia                  | Unit value | 1,072     | 818       | 970       | 735          | 1,274        |
| South Korea, subject    | Unit value | ***       | ***       | ***       | ***          | ***          |
| Subject sources         | Unit value | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject | Unit value | ***       | ***       | ***       | ***          | ***          |
| All other sources       | Unit value | 1,165     | 1,074     | 1,308     | 1,207        | 1,709        |
| Nonsubject sources      | Unit value | ***       | ***       | ***       | ***          | ***          |
| All import sources      | Unit value | 1,157     | 999       | 1,235     | 1,021        | 1,708        |

Table continued.

**Table IV-3 Continued**  
**OCTG: U.S. imports, by source and period**

Shares in percent

| Source                  | Measure           | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-------------------|-------|-------|-------|--------------|--------------|
| Argentina               | Share of quantity | 7.1   | 1.6   | 9.0   | 11.5         | 5.0          |
| Mexico                  | Share of quantity | 9.4   | 15.7  | 19.1  | 18.2         | 11.2         |
| Russia                  | Share of quantity | 9.4   | 4.7   | 8.2   | 8.3          | 6.9          |
| South Korea, subject    | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Share of quantity | 54.3  | 49.3  | 35.7  | 31.0         | 53.5         |
| Nonsubject sources      | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| Argentina               | Share of value    | 8.2   | 1.9   | 9.2   | 11.1         | 5.5          |
| Mexico                  | Share of value    | 13.3  | 21.3  | 21.9  | 21.4         | 13.5         |
| Russia                  | Share of value    | 8.7   | 3.9   | 6.4   | 6.0          | 5.1          |
| South Korea, subject    | Share of value    | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Share of value    | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Share of value    | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Share of value    | 54.7  | 53.0  | 37.8  | 36.7         | 53.6         |
| Nonsubject sources      | Share of value    | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Share of value    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Table continued.



**Table IV-3 Continued**  
**OCTG: U.S. imports, by source and period**

Ratios in percent

| Source                  | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|---------|------|------|------|--------------|--------------|
| Argentina               | Ratio   | 5.4  | 1.1  | 8.9  | 10.4         | 4.2          |
| Mexico                  | Ratio   | 7.1  | 10.6 | 18.9 | 16.4         | 9.3          |
| Russia                  | Ratio   | 7.1  | 3.2  | 8.1  | 7.5          | 5.7          |
| South Korea, subject    | Ratio   | ***  | ***  | ***  | ***          | ***          |
| Subject sources         | Ratio   | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject | Ratio   | ***  | ***  | ***  | ***          | ***          |
| All other sources       | Ratio   | 41.0 | 33.2 | 35.4 | 28.0         | 44.2         |
| Nonsubject sources      | Ratio   | ***  | ***  | ***  | ***          | ***          |
| All import sources      | Ratio   | 75.5 | 67.3 | 99.1 | 90.4         | 82.6         |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, imports value data reflect landed duty-paid values.

Note: Effective September 10, 2014, Commerce issued an antidumping duty order on imports of OCTG from South Korea. On August 12, 2020, Commerce issued a notice of continuation of this antidumping duty order. 79 FR 53691, September 10, 2014 and 85 FR 48665, August 12, 2020.

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratios are U.S. imports to mill production.

**Figure IV-1**  
**OCTG: U.S. import quantities and average unit values, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, imports value data reflect landed duty-paid values.

Table IV-4 presents data for U.S. imports of OCTG from nonsubject sources.

**Table IV-4**  
**OCTG: U.S. imports, by source and period**

Quantity in short tons; Shares in percent

| Source                             | Measure  | 2019      | 2020    | 2021    | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------------------|----------|-----------|---------|---------|--------------|--------------|
| China                              | Quantity | 395       | 1,006   | 2,443   | 101          | 4,816        |
| India                              | Quantity | 787       | 842     | 8,888   | 117          | 23,241       |
| Turkey                             | Quantity | 52,286    | 11,476  | 6,553   | 6,433        | 3,929        |
| Ukraine                            | Quantity | 112,586   | 7,364   | 101,142 | 21,028       | 24,687       |
| Vietnam                            | Quantity | 44,134    | 26,921  | ---     | ---          | ---          |
| South Korea, nonsubject            | Quantity | ***       | ***     | ***     | ***          | ***          |
| Nonsubject sources under order     | Quantity | ***       | ***     | ***     | ***          | ***          |
| Austria                            | Quantity | 107,719   | 60,975  | 119,445 | 50,427       | 73,075       |
| Canada                             | Quantity | 78,280    | 53,840  | 96,826  | 45,952       | 77,224       |
| Japan                              | Quantity | 57,627    | 18,956  | 9,969   | 6,734        | 31,065       |
| Taiwan                             | Quantity | 223,138   | 82,151  | 41,874  | 16,399       | 102,155      |
| All other sources                  | Quantity | 561,130   | 253,906 | 257,343 | 70,594       | 293,415      |
| Nonsubject sources not under order | Quantity | 1,027,894 | 469,829 | 525,457 | 190,105      | 576,935      |
| Nonsubject sources                 | Quantity | ***       | ***     | ***     | ***          | ***          |

Table continued.

**Table IV-4 Continued**  
**OCTG: U.S. imports, by source and period**

Quantity in short tons; Shares in percent

| Source                             | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------------------|---------|------|------|------|--------------|--------------|
| China                              | Share   | 0.0  | 0.1  | 0.1  | 0.0          | 0.4          |
| India                              | Share   | 0.0  | 0.1  | 0.5  | 0.0          | 2.0          |
| Turkey                             | Share   | 2.3  | 1.1  | 0.4  | 0.9          | 0.3          |
| Ukraine                            | Share   | 4.9  | 0.7  | 5.6  | 3.0          | 2.1          |
| Vietnam                            | Share   | 1.9  | 2.6  | ---  | ---          | ---          |
| South Korea, nonsubject            | Share   | ***  | ***  | ***  | ***          | ***          |
| Nonsubject sources under order     | Share   | ***  | ***  | ***  | ***          | ***          |
| Austria                            | Share   | 4.7  | 5.8  | 6.6  | 7.2          | 6.2          |
| Canada                             | Share   | 3.4  | 5.1  | 5.4  | 6.5          | 6.5          |
| Japan                              | Share   | 2.5  | 1.8  | 0.6  | 1.0          | 2.6          |
| Taiwan                             | Share   | 9.8  | 7.8  | 2.3  | 2.3          | 8.6          |
| All other sources                  | Share   | 24.6 | 24.2 | 14.2 | 10.1         | 24.8         |
| Nonsubject sources not under order | Share   | 45.1 | 44.8 | 29.1 | 27.1         | 48.8         |
| Nonsubject sources                 | Share   | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaire and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Nonsubject imports from South Korea reflect \*\*\*. Shares reflect share of imports from all import sources. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table IV-5 and figure IV-2 present data for U.S. imports of seamless OCTG. Subject imports of seamless OCTG increased by 19.8 percent during 2019-21, while nonsubject imports decreased by 29.1 percent. Subject imports of seamless OCTG were 13.4 percent lower in January-June 2022 than in January-June 2021, while nonsubject imports were 126.6 percent higher. The leading nonsubject sources of seamless OCTG were Austria, Saudi Arabia, Thailand, and Ukraine. Subject import share of total imports of seamless OCTG increased from 44.8 percent in 2019 to 45.4 percent in 2020 and then to 57.8 percent in 2021 but was lower in January-June 2022 (41.7 percent) than in January-June 2021 (65.2 percent).

**Table IV-5**  
**Seamless OCTG: U.S. imports, by source and period**

Quantity in short tons; Value in 1,000 dollars; Unit value in dollars per short ton

| Source                  | Measure    | 2019      | 2020    | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------------|-----------|---------|-----------|--------------|--------------|
| Argentina               | Quantity   | 162,875   | 16,735  | 162,640   | 81,015       | 59,593       |
| Mexico                  | Quantity   | 209,751   | 163,683 | 344,432   | 127,777      | 132,755      |
| Russia                  | Quantity   | 143,560   | 26,269  | 94,917    | 50,607       | 23,743       |
| South Korea, subject    | Quantity   | 22,254    | 3,845   | 43,088    | 22,290       | 27,949       |
| Subject sources         | Quantity   | 538,439   | 210,532 | 645,077   | 281,688      | 244,040      |
| South Korea, nonsubject | Quantity   | ---       | ---     | ---       | ---          | ---          |
| All other sources       | Quantity   | 663,592   | 253,162 | 470,715   | 150,548      | 341,159      |
| Nonsubject sources      | Quantity   | 663,592   | 253,162 | 470,715   | 150,548      | 341,159      |
| All import sources      | Quantity   | 1,202,031 | 463,694 | 1,115,792 | 432,236      | 585,199      |
| Argentina               | Value      | 216,803   | 20,331  | 205,993   | 79,842       | 110,312      |
| Mexico                  | Value      | 345,795   | 221,991 | 488,307   | 153,250      | 273,771      |
| Russia                  | Value      | 154,896   | 22,102  | 77,257    | 35,054       | 23,845       |
| South Korea, subject    | Value      | 24,839    | 2,813   | 45,766    | 21,051       | 40,120       |
| Subject sources         | Value      | 742,333   | 267,236 | 817,324   | 289,197      | 448,049      |
| South Korea, nonsubject | Value      | ---       | ---     | ---       | ---          | ---          |
| All other sources       | Value      | 864,402   | 304,254 | 614,272   | 182,265      | 591,013      |
| Nonsubject sources      | Value      | 864,402   | 304,254 | 614,272   | 182,265      | 591,013      |
| All import sources      | Value      | 1,606,734 | 571,491 | 1,431,596 | 471,462      | 1,039,062    |
| Argentina               | Unit value | 1,331     | 1,215   | 1,267     | 986          | 1,851        |
| Mexico                  | Unit value | 1,649     | 1,356   | 1,418     | 1,199        | 2,062        |
| Russia                  | Unit value | 1,079     | 841     | 814       | 693          | 1,004        |
| South Korea, subject    | Unit value | 1,116     | 731     | 1,062     | 944          | 1,435        |
| Subject sources         | Unit value | 1,379     | 1,269   | 1,267     | 1,027        | 1,836        |
| South Korea, nonsubject | Unit value | ---       | ---     | ---       | ---          | ---          |
| All other sources       | Unit value | 1,303     | 1,202   | 1,305     | 1,211        | 1,732        |
| Nonsubject sources      | Unit value | 1,303     | 1,202   | 1,305     | 1,211        | 1,732        |
| All import sources      | Unit value | 1,337     | 1,232   | 1,283     | 1,091        | 1,776        |

Table continued.

**Table IV-5 Continued**  
**Seamless OCTG: U.S. imports, by source and period**

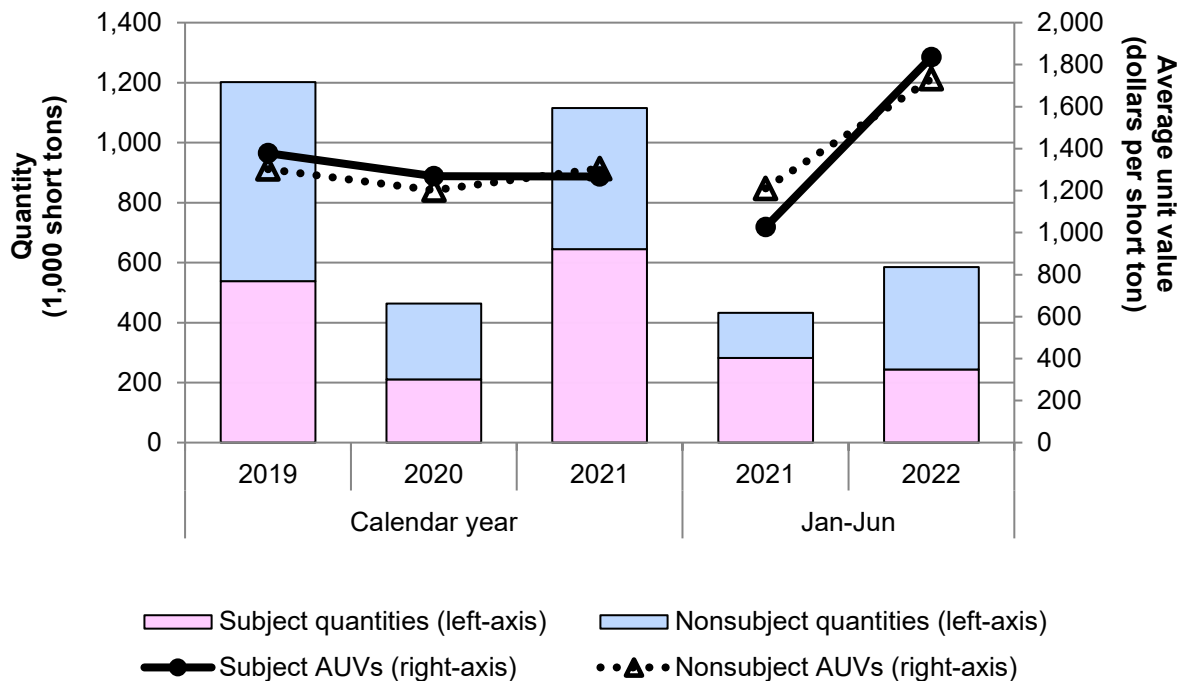
Shares and ratios in percent

| Source                  | Measure           | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-------------------|-------|-------|-------|--------------|--------------|
| Argentina               | Share of quantity | 13.5  | 3.6   | 14.6  | 18.7         | 10.2         |
| Mexico                  | Share of quantity | 17.4  | 35.3  | 30.9  | 29.6         | 22.7         |
| Russia                  | Share of quantity | 11.9  | 5.7   | 8.5   | 11.7         | 4.1          |
| South Korea, subject    | Share of quantity | 1.9   | 0.8   | 3.9   | 5.2          | 4.8          |
| Subject sources         | Share of quantity | 44.8  | 45.4  | 57.8  | 65.2         | 41.7         |
| South Korea, nonsubject | Share of quantity | ---   | ---   | ---   | ---          | ---          |
| All other sources       | Share of quantity | 55.2  | 54.6  | 42.2  | 34.8         | 58.3         |
| Nonsubject sources      | Share of quantity | 55.2  | 54.6  | 42.2  | 34.8         | 58.3         |
| All import sources      | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| Argentina               | Share of value    | 13.5  | 3.6   | 14.4  | 16.9         | 10.6         |
| Mexico                  | Share of value    | 21.5  | 38.8  | 34.1  | 32.5         | 26.3         |
| Russia                  | Share of value    | 9.6   | 3.9   | 5.4   | 7.4          | 2.3          |
| South Korea, subject    | Share of value    | 1.5   | 0.5   | 3.2   | 4.5          | 3.9          |
| Subject sources         | Share of value    | 46.2  | 46.8  | 57.1  | 61.3         | 43.1         |
| South Korea, nonsubject | Share of value    | ---   | ---   | ---   | ---          | ---          |
| All other sources       | Share of value    | 53.8  | 53.2  | 42.9  | 38.7         | 56.9         |
| Nonsubject sources      | Share of value    | 53.8  | 53.2  | 42.9  | 38.7         | 56.9         |
| All import sources      | Share of value    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| Argentina               | Ratio             | 5.4   | 1.1   | 8.9   | 10.4         | 4.2          |
| Mexico                  | Ratio             | 6.9   | 10.5  | 18.9  | 16.4         | 9.3          |
| Russia                  | Ratio             | 4.8   | 1.7   | 5.2   | 6.5          | 1.7          |
| South Korea, subject    | Ratio             | 0.7   | 0.2   | 2.4   | 2.9          | 2.0          |
| Subject sources         | Ratio             | 17.8  | 13.5  | 35.4  | 36.2         | 17.0         |
| South Korea, nonsubject | Ratio             | ---   | ---   | ---   | ---          | ---          |
| All other sources       | Ratio             | 22.0  | 16.2  | 25.8  | 19.4         | 23.8         |
| Nonsubject sources      | Ratio             | 22.0  | 16.2  | 25.8  | 19.4         | 23.8         |
| All import sources      | Ratio             | 39.8  | 29.7  | 61.2  | 55.6         | 40.8         |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, and 7304.29.6175, accessed August 9, 2022. Imports are based on the imports for consumption data series, imports value data reflect landed duty-paid values.

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratios are U.S. imports to mill production. Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Figure IV-2**  
**Seamless OCTG: U.S. import quantities and average unit values, by source and period**



Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, and 7304.29.6175, accessed August 9, 2022. Imports are based on the imports for consumption data series, imports value data reflect landed duty-paid values.

Table IV-6 and figure IV-3 present data for U.S. imports of welded OCTG. There were no imports of welded OCTG from Argentina during the period for which data were collected and only minimal quantities from Mexico during 2019 and 2020. Subject imports from South Korea accounted for \*\*\* of total welded OCTG imports during the period for which data were collected. Subject imports of welded OCTG increased by \*\*\* percent during 2019-21 and were \*\*\* percent higher in January-June 2022 compared to January-June 2021. Nonsubject imports of welded OCTG decreased by \*\*\* percent during 2019-21 but were \*\*\* percent higher in January-June 2022 than in January-June 2021. The leading nonsubject sources of welded OCTG were Canada, \*\*\*, and Taiwan. Subject import share of total imports of welded OCTG increased from \*\*\* percent in 2019 to \*\*\* percent

in 2020 and then to \*\*\* percent in 2021 but was lower in January-June 2022 (\*\*\* percent) than in January-June 2021 (\*\*\* percent).

**Table IV-6**  
**Welded OCTG: U.S. imports, by source and period**

Quantity in short tons; Value in 1,000 dollars; Unit value in dollars per short ton

| Source                  | Measure    | 2019      | 2020    | 2021    | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------------|-----------|---------|---------|--------------|--------------|
| Argentina               | Quantity   | ---       | ---     | ---     | ---          | ---          |
| Mexico                  | Quantity   | 4,446     | 1,191   | ---     | ---          | ---          |
| Russia                  | Quantity   | 71,779    | 23,071  | 53,167  | 7,474        | 57,577       |
| South Korea, subject    | Quantity   | ***       | ***     | ***     | ***          | ***          |
| Subject sources         | Quantity   | ***       | ***     | ***     | ***          | ***          |
| South Korea, nonsubject | Quantity   | ***       | ***     | ***     | ***          | ***          |
| All other sources       | Quantity   | 574,490   | 264,276 | 173,768 | 67,236       | 292,449      |
| Nonsubject sources      | Quantity   | ***       | ***     | ***     | ***          | ***          |
| All import sources      | Quantity   | 1,078,543 | 586,041 | 691,177 | 270,086      | 598,086      |
| Argentina               | Value      | ---       | ---     | ---     | ---          | ---          |
| Mexico                  | Value      | 4,613     | 991     | ---     | ---          | ---          |
| Russia                  | Value      | 75,877    | 18,274  | 66,355  | 7,615        | 79,752       |
| South Korea, subject    | Value      | ***       | ***     | ***     | ***          | ***          |
| Subject sources         | Value      | ***       | ***     | ***     | ***          | ***          |
| South Korea, nonsubject | Value      | ***       | ***     | ***     | ***          | ***          |
| All other sources       | Value      | 578,567   | 251,306 | 228,911 | 80,608       | 492,085      |
| Nonsubject sources      | Value      | ***       | ***     | ***     | ***          | ***          |
| All import sources      | Value      | 1,032,389 | 477,105 | 799,944 | 245,321      | 981,526      |
| Argentina               | Unit value | ---       | ---     | ---     | ---          | ---          |
| Mexico                  | Unit value | 1,037     | 832     | ---     | ---          | ---          |
| Russia                  | Unit value | 1,057     | 792     | 1,248   | 1,019        | 1,385        |
| South Korea, subject    | Unit value | ***       | ***     | ***     | ***          | ***          |
| Subject sources         | Unit value | ***       | ***     | ***     | ***          | ***          |
| South Korea, nonsubject | Unit value | ***       | ***     | ***     | ***          | ***          |
| All other sources       | Unit value | 1,007     | 951     | 1,317   | 1,199        | 1,683        |
| Nonsubject sources      | Unit value | ***       | ***     | ***     | ***          | ***          |
| All import sources      | Unit value | 957       | 814     | 1,157   | 908          | 1,641        |

Table continued.



**Table IV-6 Continued**  
**Welded OCTG: U.S. imports, by source and period**

Shares and ratios in percent

| Source                  | Measure           | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-------------------|-------|-------|-------|--------------|--------------|
| Argentina               | Share of quantity | ---   | ---   | ---   | ---          | ---          |
| Mexico                  | Share of quantity | 0.4   | 0.2   | ---   | ---          | ---          |
| Russia                  | Share of quantity | 6.7   | 3.9   | 7.7   | 2.8          | 9.6          |
| South Korea, subject    | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Share of quantity | 53.3  | 45.1  | 25.1  | 24.9         | 48.9         |
| Nonsubject sources      | Share of quantity | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| Argentina               | Share of value    | ---   | ---   | ---   | ---          | ---          |
| Mexico                  | Share of value    | 0.4   | 0.2   | ---   | ---          | ---          |
| Russia                  | Share of value    | 7.3   | 3.8   | 8.3   | 3.1          | 8.1          |
| South Korea, subject    | Share of value    | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Share of value    | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Share of value    | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Share of value    | 56.0  | 52.7  | 28.6  | 32.9         | 50.1         |
| Nonsubject sources      | Share of value    | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Share of value    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| Argentina               | Ratio             | ---   | ---   | ---   | ---          | ---          |
| Mexico                  | Ratio             | 0.1   | 0.1   | ---   | ---          | ---          |
| Russia                  | Ratio             | 2.4   | 1.5   | 2.9   | 1.0          | 4.0          |
| South Korea, subject    | Ratio             | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Ratio             | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Ratio             | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Ratio             | 19.0  | 16.9  | 9.5   | 8.6          | 20.4         |
| Nonsubject sources      | Ratio             | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Ratio             | 35.7  | 37.6  | 37.9  | 34.7         | 41.7         |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, imports value data reflect landed duty-paid values.

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratios are U.S. imports to mill production.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Figure IV-3**  
**Welded OCTG: U.S. import quantities and average unit values, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, imports value data reflect landed duty-paid values.

Table IV-7 presents U.S. imports by U.S. producers and/or their affiliated firms.

**Table IV-7**  
**OCTG: U.S. imports by U.S. producers and/or affiliated firms, by source and period**

Quantity in short tons; Ratios in percent

| Source                  | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|----------|------|------|------|--------------|--------------|
| Argentina               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Mexico                  | Quantity | ***  | ***  | ***  | ***          | ***          |
| Russia                  | Quantity | ***  | ***  | ***  | ***          | ***          |
| South Korea, subject    | Quantity | ***  | ***  | ***  | ***          | ***          |
| Subject sources         | Quantity | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other sources       | Quantity | ***  | ***  | ***  | ***          | ***          |
| Nonsubject sources      | Quantity | ***  | ***  | ***  | ***          | ***          |
| All import sources      | Quantity | ***  | ***  | ***  | ***          | ***          |
| Argentina               | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Mexico                  | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Russia                  | Ratio    | ***  | ***  | ***  | ***          | ***          |
| South Korea, subject    | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Subject sources         | Ratio    | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject | Ratio    | ***  | ***  | ***  | ***          | ***          |
| All other sources       | Ratio    | ***  | ***  | ***  | ***          | ***          |
| Nonsubject sources      | Ratio    | ***  | ***  | ***  | ***          | ***          |
| All import sources      | Ratio    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: \*\*\*. \*\*\*'s U.S. producer questionnaire response, II-18; and Respondents Tenaris USA, Siderca, and TAMSA's prehearing brief, pp. 40-41.

Note: The ratios represent the portion of official U.S. import statistics within the specified source that was imported by U.S. producers and/or their affiliates. These ratios are calculated from data shown in this table (numerators) and in table IV-3 (denominators).

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.<sup>4</sup> Negligible imports are generally defined in the Act, as amended, as imports from a country of

<sup>4</sup> Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.<sup>5</sup> Table IV-8 presents the individual shares of total imports by source during October 2020 through September 2021. During October 2020 through September 2021, subject imports from Argentina accounted for 8.4 percent of total imports of OCTG by quantity, subject imports from Mexico accounted for 18.7 percent, subject imports from Russia accounted for 7.1 percent, and subject imports from South Korea accounted for \*\*\* percent.

**Table IV-8**  
**OCTG: U.S. imports in the twelve-month period preceding the filing of the petition, October 2020 through September 2021**

Quantity in short tons; Share in percent

| Source of imports    | Quantity  | Share of quantity |
|----------------------|-----------|-------------------|
| Argentina            | 119,059   | 8.4               |
| Mexico               | 264,838   | 18.7              |
| Russia               | 100,610   | 7.1               |
| South Korea, subject | ***       | ***               |
| All other sources    | ***       | ***               |
| All import sources   | 1,418,406 | 100.0             |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

<sup>5</sup> Section 771 (24) of the Act (19 U.S.C § 1677(24)).

## Critical circumstances

On September 29, 2022, Commerce issued its final determination that “critical circumstances” exist with regard to LTFV imports from Mexico of OCTG from all producers/exporters in Mexico. On September 29, 2022, Commerce also issued its final determination that “critical circumstances” exist, in part, with regard to LTFV imports from Russia of OCTG from Volzhsky Pipe Plant, Joint Stock Company and the TMK Group but not from JSC Vyksa Steel Works, United Metallurgical Company, and all other producers/exporters in Russia.<sup>6</sup> In these investigations, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from May 11, 2022, the effective date of Commerce’s preliminary affirmative LTFV determinations.

Table IV-9 and figure IV-4 present data on U.S. imports from Mexico that are subject to Commerce’s critical circumstances determination in its antidumping duty investigation and table IV-10 presents U.S. importers’ inventories of imports from Mexico. Table IV-11 and figure IV-5 present data on U.S. imports from Russia that are subject to Commerce’s critical circumstances determination in its antidumping duty investigation and table IV-12 presents U.S. importers’ inventories of imports from Russia.

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<sup>6</sup> 87 FR 59041 and 59045, September 29, 2022, referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

On September 29, 2022, Commerce also issued its final determination that “critical circumstances” do not exist with regard to LTFV imports from Argentina of OCTG from all producers/exporters in Argentina. 87 FR 59054, September 29, 2022.

**Table IV-9****OCTG: U.S. imports from Mexico subject to Commerce’s affirmative final critical circumstances determination, April 2021 through March 2022**

Quantity in short tons

| Month          | Relation to petition | Quantity |
|----------------|----------------------|----------|
| April 2021     | Before               | 20,253   |
| May 2021       | Before               | 28,527   |
| June 2021      | Before               | 20,174   |
| July 2021      | Before               | 30,970   |
| August 2021    | Before               | 20,985   |
| September 2021 | Before               | 49,302   |
| October 2021   | After                | 31,999   |
| November 2021  | After                | 48,540   |
| December 2021  | After                | 34,860   |
| January 2022   | After                | 36,086   |
| February 2022  | After                | 19,355   |
| March 2022     | After                | 29,687   |

Table continued.

**Table IV-9 Continued****OCTG: U.S. imports from Mexico subject to Commerce’s affirmative final critical circumstances determination, April 2021 through March 2022**

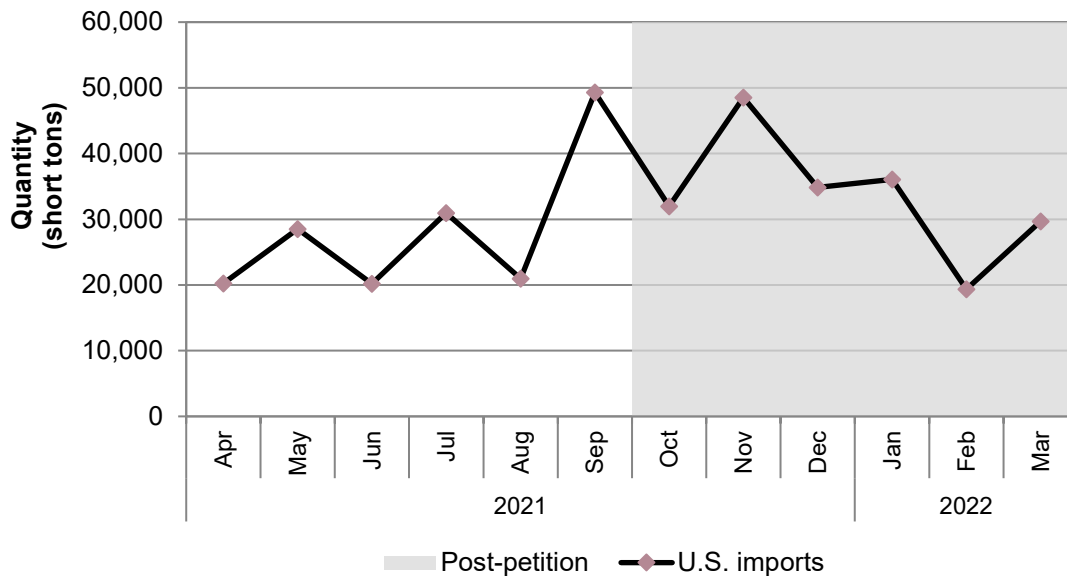
Quantity in short tons

| Comparison (pre-petition / post-petition) | Cumulative before period quantity | Cumulative after period quantity | Difference in percent |
|---|-----------------------------------|----------------------------------|-----------------------|
| 1 month                                   | 49,302                            | 31,999                           | (35.1)                |
| 2 months                                  | 70,287                            | 80,538                           | 14.6                  |
| 3 months                                  | 101,257                           | 115,398                          | 14.0                  |
| 4 months                                  | 121,431                           | 151,485                          | 24.7                  |
| 5 months                                  | 149,958                           | 170,840                          | 13.9                  |
| 6 months                                  | 170,211                           | 200,527                          | 17.8                  |

Source: Official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

**Figure IV-4**

**OCTG: U.S. imports from Mexico subject to Commerce’s affirmative final critical circumstances determination, April 2021 through March 2022**



Source: Official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

**Table IV-10**

**OCTG: U.S. importers’ inventories of imports from Mexico, by date**

Quantity in short tons; Index in percent

| Date               | Quantity | Index |
|--------------------|----------|-------|
| March 30, 2021     | ***      | ***   |
| June 30, 2021      | ***      | ***   |
| September 30, 2021 | ***      | 100.0 |
| December 31, 2021  | ***      | ***   |
| March 30, 2022     | ***      | ***   |
| June 30, 2022      | ***      | ***   |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Index based on U.S. importers’ end-of-period inventories on September 30, 2021, equal to 100.0 percent.

**Table IV-11****OCTG: U.S. imports from Russia subject to Commerce’s affirmative final critical circumstances determination, April 2021 through March 2022**

Quantity in short tons

| Month          | Relation to petition | Quantity |
|----------------|----------------------|----------|
| April 2021     | Before               | ***      |
| May 2021       | Before               | ***      |
| June 2021      | Before               | ***      |
| July 2021      | Before               | ***      |
| August 2021    | Before               | ***      |
| September 2021 | Before               | ***      |
| October 2021   | After                | ***      |
| November 2021  | After                | ***      |
| December 2021  | After                | ***      |
| January 2022   | After                | ***      |
| February 2022  | After                | ***      |
| March 2022     | After                | ***      |

Table continued.

**Table IV-11 Continued****OCTG: U.S. imports from Russia subject to Commerce’s affirmative final critical circumstances determination, April 2021 through March 2022**

Quantity in short tons

| Comparison (pre-petition / post-petition) | Cumulative before period quantity | Cumulative after period quantity | Difference in percent |
|---|-----------------------------------|----------------------------------|-----------------------|
| 1 month                                   | ***                               | ***                              | ***                   |
| 2 months                                  | ***                               | ***                              | ***                   |
| 3 months                                  | ***                               | ***                              | ***                   |
| 4 months                                  | ***                               | ***                              | ***                   |
| 5 months                                  | ***                               | ***                              | ***                   |
| 6 months                                  | ***                               | ***                              | ***                   |

Source: \*\*\*, October 3, 2022.

Note: \*\*\*, \*\*\*'s U.S. importer questionnaire responses, II-9a.



**Figure IV-5**

**OCTG: U.S. imports from Russia subject to Commerce’s affirmative final critical circumstances determination, April 2021 through March 2022**

\* \* \* \* \*

Source: \*\*\*, October 3, 2022.

Note: \*\*\*, \*\*\*’s U.S. importer questionnaire responses, II-9a.

**Table IV-12**

**OCTG: U.S. importers’ inventories of imports from Russia, by date**

Quantity in short tons; Index in percent

| <b>Date</b>        | <b>Quantity</b> | <b>Index</b> |
|--------------------|-----------------|--------------|
| March 30, 2021     | ***             | ***          |
| June 30, 2021      | ***             | ***          |
| September 30, 2021 | ***             | 100.0        |
| December 31, 2021  | ***             | ***          |
| March 30, 2022     | ***             | ***          |
| June 30, 2022      | ***             | ***          |

Source: Compiled from data submitted \*\*\* in response to Commission questionnaires.

Note: \*\*\*, \*\*\*’s U.S. importer questionnaire responses, II-9a.

Note: Index based on U.S. importers’ end-of-period inventories on September 30, 2021, equal to 100.0 percent.

## Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

### Fungibility<sup>7</sup>

Table IV-13 and figure IV-6 present U.S. mills' production and U.S. imports of OCTG by production method during 2021. Seamless OCTG accounted for the large majority (\*\*\*) percent of U.S. mills' total OCTG production in 2021. During 2021, all U.S. imports from Argentina and Mexico and the majority of U.S. imports from Russia were seamless, whereas \*\*\* of subject imports from South Korea were welded.

**Table IV-13**  
**OCTG: U.S. mills' production and U.S. imports, by source and method of production, 2021**

Quantity in short tons

| Source                  | Seamless  | Welded  | All production methods |
|-------------------------|-----------|---------|------------------------|
| U.S. producers          | ***       | ***     | ***                    |
| Argentina               | 162,640   | ---     | 162,640                |
| Mexico                  | 344,432   | ---     | 344,432                |
| Russia                  | 94,917    | 53,167  | 148,084                |
| South Korea, subject    | ***       | ***     | ***                    |
| Subject sources         | ***       | ***     | ***                    |
| South Korea, nonsubject | ***       | ***     | ***                    |
| All other sources       | 470,715   | 173,768 | 644,483                |
| Nonsubject sources      | ***       | ***     | ***                    |
| All import sources      | 1,115,792 | 691,177 | 1,806,970              |
| All sources             | ***       | ***     | ***                    |

Table continued.

<sup>7</sup> See appendix G for additional breakouts of U.S. mills' U.S. shipments and U.S. importers' U.S. shipments of imports.

**Table IV-13 Continued**  
**OCTG: U.S. mills' production and U.S. imports, by source and method of production, 2021**

Shares across in percent

| Source                  | Seamless | Welded | All production methods |
|-------------------------|----------|--------|------------------------|
| U.S. producers          | ***      | ***    | 100.0                  |
| Argentina               | 100.0    | ---    | 100.0                  |
| Mexico                  | 100.0    | ---    | 100.0                  |
| Russia                  | 64.1     | 35.9   | 100.0                  |
| South Korea, subject    | ***      | ***    | 100.0                  |
| Subject sources         | ***      | ***    | 100.0                  |
| South Korea, nonsubject | ***      | ***    | 100.0                  |
| All other sources       | 73.0     | 27.0   | 100.0                  |
| Nonsubject sources      | ***      | ***    | 100.0                  |
| All import sources      | 61.7     | 38.3   | 100.0                  |
| All sources             | ***      | ***    | 100.0                  |

Table continued.

**Table IV-13 Continued**  
**OCTG: U.S. mills' production and U.S. imports, by source and method of production, 2021**

Shares down in percent

| Source                  | Seamless | Welded | All production methods |
|-------------------------|----------|--------|------------------------|
| U.S. producers          | ***      | ***    | ***                    |
| Argentina               | ***      | ***    | ***                    |
| Mexico                  | ***      | ***    | ***                    |
| Russia                  | ***      | ***    | ***                    |
| South Korea, subject    | ***      | ***    | ***                    |
| Subject sources         | ***      | ***    | ***                    |
| South Korea, nonsubject | ***      | ***    | ***                    |
| All other sources       | ***      | ***    | ***                    |
| Nonsubject sources      | ***      | ***    | ***                    |
| All import sources      | ***      | ***    | ***                    |
| All sources             | 100.0    | 100.0  | 100.0                  |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Figure IV-6**  
**OCTG: U.S. mills' production and U.S. imports, by source and method of production, 2021**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Table IV-14 and figure IV-7 present U.S. mills' and U.S. importers' U.S. shipments by end finish in 2021. U.S. mills' U.S. shipments and U.S. importers' U.S. shipments of imports from Argentina and Mexico were predominantly or exclusively of \*\*\* OCTG, as were the majority of U.S. importers' U.S. shipments of imports from Russia. Similarly, the vast majority of U.S. importers' U.S. shipments of subject imports from South Korea were of \*\*\* OCTG.

**Table IV-14**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Quantity in short tons

| Source                  | Plain end | Threaded / coupled | All end finishes |
|-------------------------|-----------|--------------------|------------------|
| U.S. producers          | ***       | ***                | ***              |
| Argentina               | ***       | ***                | ***              |
| Mexico                  | ***       | ***                | ***              |
| Russia                  | ***       | ***                | ***              |
| South Korea, subject    | ***       | ***                | ***              |
| Subject sources         | ***       | ***                | ***              |
| South Korea, nonsubject | ***       | ***                | ***              |
| All other sources       | ***       | ***                | ***              |
| Nonsubject sources      | ***       | ***                | ***              |
| All import sources      | ***       | ***                | ***              |
| All sources             | ***       | ***                | ***              |

Table continued.

**Table IV-14 Continued**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Shares across in percent

| Source                  | Plain end | Threaded / coupled | All end finishes |
|-------------------------|-----------|--------------------|------------------|
| U.S. producers          | ***       | ***                | 100.0            |
| Argentina               | ***       | ***                | 100.0            |
| Mexico                  | ***       | ***                | 100.0            |
| Russia                  | ***       | ***                | 100.0            |
| South Korea, subject    | ***       | ***                | 100.0            |
| Subject sources         | ***       | ***                | 100.0            |
| South Korea, nonsubject | ***       | ***                | 100.0            |
| All other sources       | ***       | ***                | 100.0            |
| Nonsubject sources      | ***       | ***                | 100.0            |
| All import sources      | ***       | ***                | 100.0            |
| All sources             | ***       | ***                | 100.0            |

Table continued.

**Table IV-14 Continued**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Shares down in percent

| Source                  | Plain end | Threaded /<br>coupled | All end finishes |
|-------------------------|-----------|-----------------------|------------------|
| U.S. producers          | ***       | ***                   | ***              |
| Argentina               | ***       | ***                   | ***              |
| Mexico                  | ***       | ***                   | ***              |
| Russia                  | ***       | ***                   | ***              |
| South Korea, subject    | ***       | ***                   | ***              |
| Subject sources         | ***       | ***                   | ***              |
| South Korea, nonsubject | ***       | ***                   | ***              |
| All other sources       | ***       | ***                   | ***              |
| Nonsubject sources      | ***       | ***                   | ***              |
| All import sources      | ***       | ***                   | ***              |
| All sources             | 100.0     | 100.0                 | 100.0            |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Figure IV-7**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-15 and figure IV-8 present U.S. mills' and U.S. importers' U.S. shipments by principal grade in 2021. U.S. mills' U.S. shipments were predominantly of \*\*\* OCTG, while U.S. importers' U.S. shipments of subject imports from South Korea were predominantly of \*\*\* OCTG. The vast majority of U.S. importers' U.S. shipments of imports from Russia were of \*\*\* OCTG. U.S. importers' U.S. shipments of imports from Mexico primarily consisted of \*\*\* OCTG and U.S. importers' U.S. shipments of imports from Argentina were predominantly of \*\*\* OCTG.

**Table IV-15**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Quantity in short tons

| Source                  | J-55 | L-80 | P-110 | All other grades | All grades |
|-------------------------|------|------|-------|------------------|------------|
| U.S. producers          | ***  | ***  | ***   | ***              | ***        |
| Argentina               | ***  | ***  | ***   | ***              | ***        |
| Mexico                  | ***  | ***  | ***   | ***              | ***        |
| Russia                  | ***  | ***  | ***   | ***              | ***        |
| South Korea, subject    | ***  | ***  | ***   | ***              | ***        |
| Subject sources         | ***  | ***  | ***   | ***              | ***        |
| South Korea, nonsubject | ***  | ***  | ***   | ***              | ***        |
| All other sources       | ***  | ***  | ***   | ***              | ***        |
| Nonsubject sources      | ***  | ***  | ***   | ***              | ***        |
| All import sources      | ***  | ***  | ***   | ***              | ***        |
| All sources             | ***  | ***  | ***   | ***              | ***        |

Table continued.

**Table IV-15 Continued**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Shares across in percent

| Source                  | J-55 | L-80 | P-110 | All other grades | All grades |
|-------------------------|------|------|-------|------------------|------------|
| U.S. producers          | ***  | ***  | ***   | ***              | 100.0      |
| Argentina               | ***  | ***  | ***   | ***              | 100.0      |
| Mexico                  | ***  | ***  | ***   | ***              | 100.0      |
| Russia                  | ***  | ***  | ***   | ***              | 100.0      |
| South Korea, subject    | ***  | ***  | ***   | ***              | 100.0      |
| Subject sources         | ***  | ***  | ***   | ***              | 100.0      |
| South Korea, nonsubject | ***  | ***  | ***   | ***              | 100.0      |
| All other sources       | ***  | ***  | ***   | ***              | 100.0      |
| Nonsubject sources      | ***  | ***  | ***   | ***              | 100.0      |
| All import sources      | ***  | ***  | ***   | ***              | 100.0      |
| All sources             | ***  | ***  | ***   | ***              | 100.0      |

Table continued.

**Table IV-15 Continued**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Shares down in percent

| Source                  | J-55  | L-80  | P-110 | All other grades | All grades |
|-------------------------|-------|-------|-------|------------------|------------|
| U.S. producers          | ***   | ***   | ***   | ***              | ***        |
| Argentina               | ***   | ***   | ***   | ***              | ***        |
| Mexico                  | ***   | ***   | ***   | ***              | ***        |
| Russia                  | ***   | ***   | ***   | ***              | ***        |
| South Korea, subject    | ***   | ***   | ***   | ***              | ***        |
| Subject sources         | ***   | ***   | ***   | ***              | ***        |
| South Korea, nonsubject | ***   | ***   | ***   | ***              | ***        |
| All other sources       | ***   | ***   | ***   | ***              | ***        |
| Nonsubject sources      | ***   | ***   | ***   | ***              | ***        |
| All import sources      | ***   | ***   | ***   | ***              | ***        |
| All sources             | 100.0 | 100.0 | 100.0 | 100.0            | 100.0      |

Source: Compiled from data submitted in response to Commission questionnaires.

**Figure IV-8**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.



Table IV-16 and figure IV-9 present U.S. mills' and U.S. importers' U.S. shipments by grade in 2021. \*\*\* U.S. shipments from each source were of casing and tubing; coupling stock accounted for \*\*\* percent of total U.S. shipments.

**Table IV-16**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by product type, 2021**

Quantity in short tons

| Source                  | Casing and tubing | Coupling stock | All product types |
|-------------------------|-------------------|----------------|-------------------|
| U.S. producers          | ***               | ***            | ***               |
| Argentina               | ***               | ***            | ***               |
| Mexico                  | ***               | ***            | ***               |
| Russia                  | ***               | ***            | ***               |
| South Korea, subject    | ***               | ***            | ***               |
| Subject sources         | ***               | ***            | ***               |
| South Korea, nonsubject | ***               | ***            | ***               |
| All other sources       | ***               | ***            | ***               |
| Nonsubject sources      | ***               | ***            | ***               |
| All import sources      | ***               | ***            | ***               |
| All sources             | ***               | ***            | ***               |

Table continued.

**Table IV-16 Continued**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by product type, 2021**

Shares across in percent

| Source                  | Casing and tubing | Coupling stock | All product types |
|-------------------------|-------------------|----------------|-------------------|
| U.S. producers          | ***               | ***            | 100.0             |
| Argentina               | ***               | ***            | 100.0             |
| Mexico                  | ***               | ***            | 100.0             |
| Russia                  | ***               | ***            | 100.0             |
| South Korea, subject    | ***               | ***            | 100.0             |
| Subject sources         | ***               | ***            | 100.0             |
| South Korea, nonsubject | ***               | ***            | 100.0             |
| All other sources       | ***               | ***            | 100.0             |
| Nonsubject sources      | ***               | ***            | 100.0             |
| All import sources      | ***               | ***            | 100.0             |
| All sources             | ***               | ***            | 100.0             |

Table continued.

**Table IV-16 Continued**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by product type, 2021**

Shares down in percent

| Source                  | Casing and tubing | Coupling stock | All product types |
|-------------------------|-------------------|----------------|-------------------|
| U.S. producers          | ***               | ***            | ***               |
| Argentina               | ***               | ***            | ***               |
| Mexico                  | ***               | ***            | ***               |
| Russia                  | ***               | ***            | ***               |
| South Korea, subject    | ***               | ***            | ***               |
| Subject sources         | ***               | ***            | ***               |
| South Korea, nonsubject | ***               | ***            | ***               |
| All other sources       | ***               | ***            | ***               |
| Nonsubject sources      | ***               | ***            | ***               |
| All import sources      | ***               | ***            | ***               |
| All sources             | 100.0             | 100.0          | 100.0             |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Figure IV-9**  
**OCTG: U.S. mills' and U.S. importers' U.S. shipments, by product type, 2021**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

## Geographical markets

Table IV-17 presents U.S. imports of OCTG by source and border of entry, based on official Commerce import statistics. Data for South Korea and subject sources includes merchandise imported from all South Korean producers/exporters, including nonsubject merchandise from Hyundai Steel Corporation. During 2021, the vast majority of imports from Argentina, Russia, and South Korea entered through the Southern border of entry, specifically through the Houston-Galveston, Texas Customs district. The vast majority of imports from Mexico also entered through the Southern border of entry, with approximately two-thirds of those imports entering through the Houston-Galveston, Texas Customs district and one-fourth through the Laredo, Texas Customs district.

**Table IV-17**  
**OCTG: U.S. imports, by source and border of entry, 2021**

Quantity in short tons

| Source             | East   | North  | South     | West | All borders |
|--------------------|--------|--------|-----------|------|-------------|
| Argentina          | ---    | 70     | 162,570   | ---  | 162,640     |
| Mexico             | 15,865 | 3,006  | 325,561   | ---  | 344,432     |
| Russia             | 779    | 28     | 147,278   | ---  | 148,084     |
| South Korea        | ---    | ---    | 506,775   | 556  | 507,331     |
| Subject sources    | 16,644 | 3,103  | 1,142,183 | 556  | 1,162,487   |
| Nonsubject sources | 75,857 | 52,851 | 515,463   | 312  | 644,483     |
| All import sources | 92,501 | 55,955 | 1,657,646 | 868  | 1,806,970   |

Table continued.

**Table IV-17 Continued**  
**OCTG: U.S. imports, by source and border of entry, 2021**

Share across in percent

| Source             | East | North | South | West | All borders |
|--------------------|------|-------|-------|------|-------------|
| Argentina          | ---  | 0.0   | 100.0 | ---  | 100.0       |
| Mexico             | 4.6  | 0.9   | 94.5  | ---  | 100.0       |
| Russia             | 0.5  | 0.0   | 99.5  | ---  | 100.0       |
| South Korea        | ---  | ---   | 99.9  | 0.1  | 100.0       |
| Subject sources    | 1.4  | 0.3   | 98.3  | 0.0  | 100.0       |
| Nonsubject sources | 11.8 | 8.2   | 80.0  | 0.0  | 100.0       |
| All import sources | 5.1  | 3.1   | 91.7  | 0.0  | 100.0       |

Table continued.

**Table IV-17 Continued**  
**OCTG: U.S. imports, by source and border of entry, 2021**

Share down in percent

| Source             | East  | North | South | West  | All borders |
|--------------------|-------|-------|-------|-------|-------------|
| Argentina          | ---   | 0.1   | 9.8   | ---   | 9.0         |
| Mexico             | 17.2  | 5.4   | 19.6  | ---   | 19.1        |
| Russia             | 0.8   | 0.0   | 8.9   | ---   | 8.2         |
| South Korea        | ---   | ---   | 30.6  | 64.1  | 28.1        |
| Subject sources    | 18.0  | 5.5   | 68.9  | 64.1  | 64.3        |
| Nonsubject sources | 82.0  | 94.5  | 31.1  | 35.9  | 35.7        |
| All import sources | 100.0 | 100.0 | 100.0 | 100.0 | 100.0       |

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Data for South Korea and subject sources includes merchandise imported from all South Korean producers/exporters, including nonsubject merchandise from Hyundai Steel Corporation.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Presence in the market

Table IV-18 and figures IV-10 and IV-12 present monthly U.S. import data during January 2019 through June 2022. Data for South Korea and subject sources includes merchandise imported from all South Korean producers/exporters, including nonsubject merchandise from Hyundai Steel Corporation. Imports from Mexico and South Korea were present in each month between January 2019 and June 2022, imports from Russia were present in 38 of 42 months, and imports from Argentina were present in 37 of 42 months. During this period, imports from Argentina were at their highest in June 2019, imports from Mexico were at their highest in September 2021, and imports from Russia and South Korea were at their highest in January 2019.

**Table IV-18**  
**OCTG: U.S. imports, by source and month**

Quantity in short tons

| Year | Month     | Argentina | Mexico | Russia | South Korea |
|------|-----------|-----------|--------|--------|-------------|
| 2019 | January   | 4,568     | 33,713 | 48,622 | 77,980      |
| 2019 | February  | 12,191    | 14,996 | 6,198  | 17,415      |
| 2019 | March     | 17,317    | 15,855 | 35,868 | 45,891      |
| 2019 | April     | 5,235     | 19,231 | 42,205 | 59,730      |
| 2019 | May       | 5,139     | 28,049 | 28,929 | 46,245      |
| 2019 | June      | 28,269    | 11,777 | 15,122 | 12,944      |
| 2019 | July      | 12,131    | 20,951 | 21,595 | 17,816      |
| 2019 | August    | 13,117    | 11,764 | 12,589 | 44,534      |
| 2019 | September | 23,365    | 10,864 | 56     | 23,839      |
| 2019 | October   | 11,158    | 17,418 | 1,870  | 21,033      |
| 2019 | November  | 11,973    | 14,944 | 2,286  | 43,335      |
| 2019 | December  | 18,411    | 14,634 | ---    | 39,321      |
| 2020 | January   | 5,210     | 24,933 | 5,139  | 7,926       |
| 2020 | February  | 4,755     | 16,672 | 13,483 | 5,635       |
| 2020 | March     | 114       | 21,115 | 2,101  | 59,345      |
| 2020 | April     | 413       | 20,570 | 10,882 | 9,373       |
| 2020 | May       | 23        | 13,396 | 5,860  | 53,329      |
| 2020 | June      | ---       | 12,987 | 7,738  | 30,814      |
| 2020 | July      | 36        | 2,983  | 145    | 38,654      |
| 2020 | August    | 22        | 7,316  | ---    | 16,140      |
| 2020 | September | ---       | 9,098  | 174    | 576         |
| 2020 | October   | ---       | 8,299  | 488    | 25,211      |
| 2020 | November  | 1,404     | 5,801  | 272    | 10,927      |
| 2020 | December  | 4,758     | 21,705 | 3,058  | 43,418      |
| 2021 | January   | 7,872     | 19,277 | 7,794  | 11,450      |
| 2021 | February  | 12,660    | 14,709 | 2      | 41,343      |
| 2021 | March     | 12,481    | 24,836 | 16,424 | 48,763      |
| 2021 | April     | 24,920    | 20,253 | 506    | 33,058      |
| 2021 | May       | 11,034    | 28,527 | 15,686 | 28,494      |
| 2021 | June      | 12,047    | 20,174 | 17,668 | 54,557      |
| 2021 | July      | 23,938    | 30,970 | 16,714 | 58,088      |
| 2021 | August    | ---       | 20,985 | 13,110 | 8,987       |
| 2021 | September | 7,944     | 49,302 | 8,888  | 77,660      |
| 2021 | October   | 13,351    | 31,999 | 18,116 | 41,096      |
| 2021 | November  | 20,977    | 48,540 | 21,716 | 31,378      |
| 2021 | December  | 15,415    | 34,860 | 11,461 | 72,455      |
| 2022 | January   | 10,584    | 36,086 | 22,968 | 22,220      |
| 2022 | February  | 8,916     | 19,355 | 10,980 | 48,783      |
| 2022 | March     | 25,033    | 29,687 | 27,764 | 44,837      |
| 2022 | April     | 15,003    | 30,118 | ---    | 74,619      |
| 2022 | May       | ---       | 10,506 | 19,609 | 52,003      |
| 2022 | June      | 56        | 7,002  | ---    | 33,547      |

Table continued.

**Table IV-18 Continued**  
**OCTG: U.S. imports, by source and month**

Quantity in short tons

| <b>Year</b> | <b>Month</b> | <b>Subject sources</b> | <b>Nonsubject sources</b> | <b>All import sources</b> |
|-------------|--------------|------------------------|---------------------------|---------------------------|
| 2019        | January      | 164,883                | 158,484                   | 323,368                   |
| 2019        | February     | 50,800                 | 139,315                   | 190,115                   |
| 2019        | March        | 114,931                | 118,223                   | 233,154                   |
| 2019        | April        | 126,401                | 120,687                   | 247,088                   |
| 2019        | May          | 108,362                | 106,374                   | 214,736                   |
| 2019        | June         | 68,111                 | 124,611                   | 192,722                   |
| 2019        | July         | 72,493                 | 126,467                   | 198,961                   |
| 2019        | August       | 82,003                 | 106,023                   | 188,026                   |
| 2019        | September    | 58,124                 | 84,563                    | 142,688                   |
| 2019        | October      | 51,478                 | 60,514                    | 111,992                   |
| 2019        | November     | 72,538                 | 53,285                    | 125,823                   |
| 2019        | December     | 72,366                 | 39,534                    | 111,900                   |
| 2020        | January      | 43,207                 | 74,002                    | 117,209                   |
| 2020        | February     | 40,545                 | 41,285                    | 81,830                    |
| 2020        | March        | 82,675                 | 104,103                   | 186,778                   |
| 2020        | April        | 41,238                 | 43,555                    | 84,793                    |
| 2020        | May          | 72,608                 | 88,066                    | 160,674                   |
| 2020        | June         | 51,539                 | 54,837                    | 106,376                   |
| 2020        | July         | 41,817                 | 24,821                    | 66,638                    |
| 2020        | August       | 23,478                 | 21,537                    | 45,015                    |
| 2020        | September    | 9,848                  | 8,924                     | 18,772                    |
| 2020        | October      | 33,998                 | 21,163                    | 55,161                    |
| 2020        | November     | 18,404                 | 17,959                    | 36,363                    |
| 2020        | December     | 72,940                 | 17,188                    | 90,127                    |

Table continued.

**Table IV-18 Continued**  
**OCTG: U.S. imports, by source and month**

Quantity in short tons

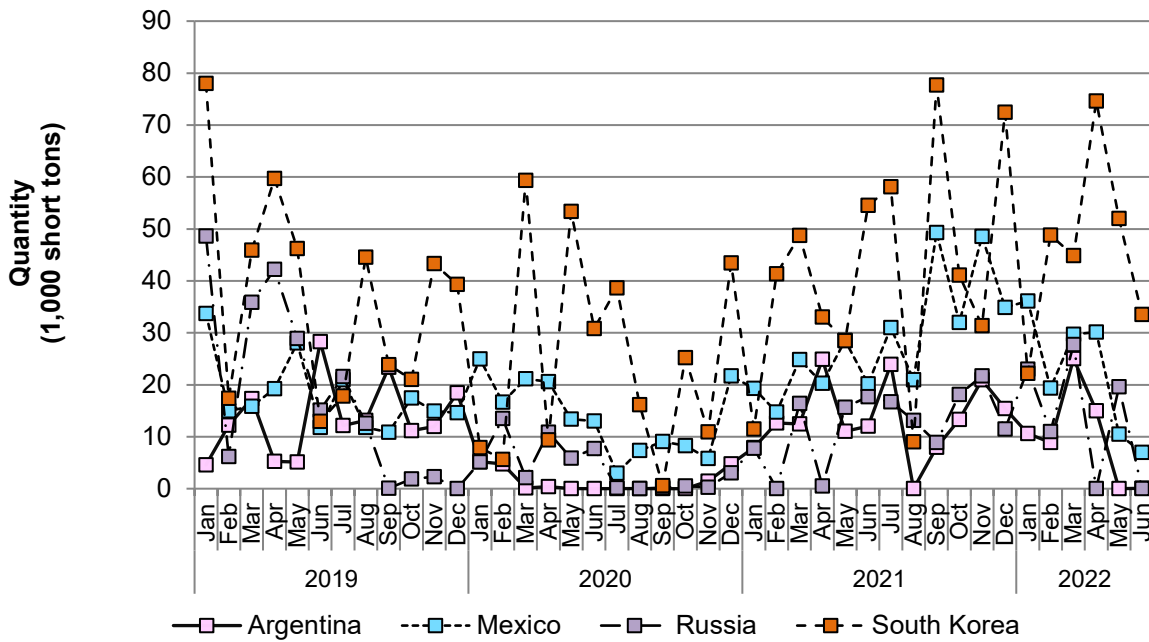
| Year | Month     | Subject sources | Nonsubject sources | All import sources |
|------|-----------|-----------------|--------------------|--------------------|
| 2021 | January   | 46,393          | 33,751             | 80,144             |
| 2021 | February  | 68,715          | 15,230             | 83,945             |
| 2021 | March     | 102,504         | 25,814             | 128,318            |
| 2021 | April     | 78,738          | 38,231             | 116,968            |
| 2021 | May       | 83,742          | 40,658             | 124,400            |
| 2021 | June      | 104,446         | 64,100             | 168,546            |
| 2021 | July      | 129,710         | 46,233             | 175,943            |
| 2021 | August    | 43,081          | 73,503             | 116,584            |
| 2021 | September | 143,794         | 98,111             | 241,905            |
| 2021 | October   | 104,561         | 54,054             | 158,615            |
| 2021 | November  | 122,611         | 79,600             | 202,211            |
| 2021 | December  | 134,191         | 75,197             | 209,389            |
| 2022 | January   | 91,858          | 79,364             | 171,223            |
| 2022 | February  | 88,034          | 78,399             | 166,433            |
| 2022 | March     | 127,321         | 84,133             | 211,454            |
| 2022 | April     | 119,740         | 105,156            | 224,897            |
| 2022 | May       | 82,118          | 121,828            | 203,946            |
| 2022 | June      | 40,605          | 164,728            | 205,333            |

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Data for South Korea and subject sources includes merchandise imported from all South Korean producers/exporters, including nonsubject merchandise from Hyundai Steel Corporation.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Figure IV-10**  
**OCTG: U.S. imports from individual subject sources, by source and month**

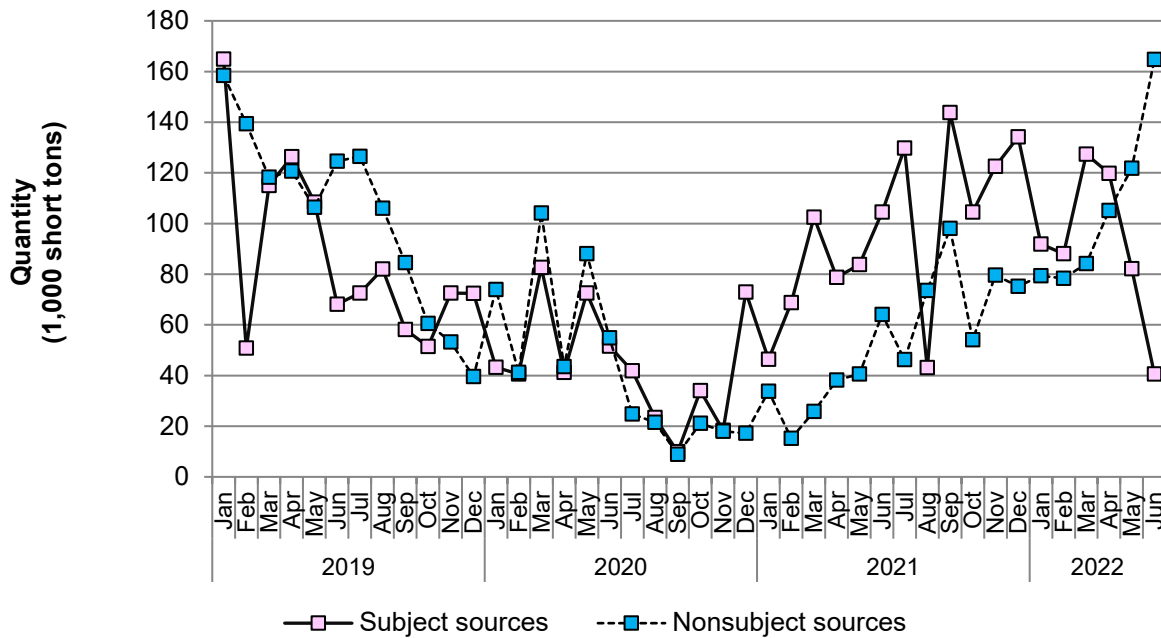


Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Data for South Korea includes merchandise imported from all South Korean producers/exporters, including nonsubject merchandise from Hyundai Steel Corporation.



**Figure IV-11**  
**OCTG: U.S. imports from aggregated subject and nonsubject sources, by month**



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Data for subject sources includes merchandise imported from all South Korean producers/exporters, including nonsubject merchandise from Hyundai Steel Corporation.

## Apparent U.S. consumption and market shares

### Quantity

Table IV-19 and figure IV-12 present data on apparent U.S. consumption and U.S. market shares based on quantity for OCTG. The quantity of apparent U.S. consumption decreased by 49.6 percent during 2019-20 then increased by 32.2 percent during 2020-21, ending 33.4 percent lower in 2021 than in 2019. The quantity of apparent U.S. consumption was 70.6 percent higher in January-June 2022 than in January-June 2021. U.S. producers' market share based on quantity increased from 56.7 percent in 2019 to 60.4 percent in 2020 but then decreased to 48.4 percent in 2021, ending 8.2 percentage points lower in 2021 than in 2019. U.S. producers' market share was 0.6 percentage points higher in January-June 2022 than in January-June 2021. Subject import market share increased by \*\*\* percentage points during 2019-21, decreasing from \*\*\* percent in 2019 to \*\*\* percent in 2020 but then increasing to \*\*\* percent in 2021. Subject import market share was \*\*\* percentage points lower in January-June 2022 than in January-June 2021. Nonsubject import market share decreased by \*\*\* percentage points during 2019-21, decreasing from \*\*\* percent in 2019 to \*\*\* percent in 2020 then to \*\*\* percent in 2021. Nonsubject import market share was \*\*\* percentage points higher in January-June 2022 than in January-June 2021.

**Table IV-19**  
**OCTG: Apparent U.S. consumption and market shares based on quantity, by source and period**

Quantity in short tons; Shares in percent

| Source                  | Measure  | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|----------|-----------|-----------|-----------|--------------|--------------|
| U.S. producers          | Quantity | 2,983,013 | 1,601,197 | 1,697,888 | 719,001      | 1,241,472    |
| Argentina               | Quantity | 162,875   | 16,735    | 162,640   | 81,015       | 59,593       |
| Mexico                  | Quantity | 214,197   | 164,874   | 344,432   | 127,777      | 132,755      |
| Russia                  | Quantity | 215,339   | 49,340    | 148,084   | 58,081       | 81,321       |
| South Korea, subject    | Quantity | ***       | ***       | ***       | ***          | ***          |
| Subject sources         | Quantity | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject | Quantity | ***       | ***       | ***       | ***          | ***          |
| All other sources       | Quantity | 1,238,082 | 517,438   | 644,483   | 217,784      | 633,608      |
| Nonsubject sources      | Quantity | ***       | ***       | ***       | ***          | ***          |
| All import sources      | Quantity | 2,280,575 | 1,049,735 | 1,806,970 | 702,322      | 1,183,285    |
| All sources             | Quantity | 5,263,588 | 2,650,932 | 3,504,858 | 1,421,323    | 2,424,757    |
| U.S. producers          | Share    | 56.7      | 60.4      | 48.4      | 50.6         | 51.2         |
| Argentina               | Share    | 3.1       | 0.6       | 4.6       | 5.7          | 2.5          |
| Mexico                  | Share    | 4.1       | 6.2       | 9.8       | 9.0          | 5.5          |
| Russia                  | Share    | 4.1       | 1.9       | 4.2       | 4.1          | 3.4          |
| South Korea, subject    | Share    | ***       | ***       | ***       | ***          | ***          |
| Subject sources         | Share    | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject | Share    | ***       | ***       | ***       | ***          | ***          |
| All other sources       | Share    | 23.5      | 19.5      | 18.4      | 15.3         | 26.1         |
| Nonsubject sources      | Share    | ***       | ***       | ***       | ***          | ***          |
| All import sources      | Share    | 43.3      | 39.6      | 51.6      | 49.4         | 48.8         |
| All sources             | Share    | 100.0     | 100.0     | 100.0     | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Quantity for U.S. producers' U.S. shipments reflects mill's U.S. shipment quantities. Value for U.S. producers' U.S. shipments reflects OCTG products sold in the United States from domestically manufactured OCTG (including the incremental value from U.S. non-toll processors' heat treatment of domestic OCTG), as well as the incremental value from U.S. processors' heat treatment of imported OCTG. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import.

**Figure IV-12**  
**OCTG: Apparent U.S. consumption based on quantity, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports quantities are based on the imports for consumption data series.

Table IV-20 presents additional detail for U.S. producers' U.S. shipments and U.S. imports of seamless OCTG.

**Table IV-20**  
**Seamless OCTG: U.S. producers' U.S. shipments and U.S. imports, by source and period**

Quantity in short tons; Shares in percent

| Source                  | Measure  | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|----------|-----------|-----------|-----------|--------------|--------------|
| U.S. producers          | Quantity | 1,864,382 | 1,112,257 | 1,446,865 | 610,860      | 992,151      |
| Argentina               | Quantity | 162,875   | 16,735    | 162,640   | 81,015       | 59,593       |
| Mexico                  | Quantity | 209,751   | 163,683   | 344,432   | 127,777      | 132,755      |
| Russia                  | Quantity | 143,560   | 26,269    | 94,917    | 50,607       | 23,743       |
| South Korea, subject    | Quantity | ***       | ***       | ***       | ***          | ***          |
| Subject sources         | Quantity | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject | Quantity | ***       | ***       | ***       | ***          | ***          |
| All other sources       | Quantity | 663,592   | 253,162   | 470,715   | 150,548      | 341,159      |
| Nonsubject sources      | Quantity | ***       | ***       | ***       | ***          | ***          |
| All import sources      | Quantity | 1,202,031 | 463,694   | 1,115,792 | 432,236      | 585,199      |
| All sources             | Quantity | 3,066,413 | 1,575,951 | 2,562,657 | 1,043,096    | 1,577,350    |
| U.S. producers          | Share    | 60.8      | 70.6      | 56.5      | 58.6         | 62.9         |
| Argentina               | Share    | 5.3       | 1.1       | 6.3       | 7.8          | 3.8          |
| Mexico                  | Share    | 6.8       | 10.4      | 13.4      | 12.2         | 8.4          |
| Russia                  | Share    | 4.7       | 1.7       | 3.7       | 4.9          | 1.5          |
| South Korea, subject    | Share    | ***       | ***       | ***       | ***          | ***          |
| Subject sources         | Share    | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject | Share    | ***       | ***       | ***       | ***          | ***          |
| All other sources       | Share    | 21.6      | 16.1      | 18.4      | 14.4         | 21.6         |
| Nonsubject sources      | Share    | ***       | ***       | ***       | ***          | ***          |
| All import sources      | Share    | 39.2      | 29.4      | 43.5      | 41.4         | 37.1         |
| All sources             | Share    | 100.0     | 100.0     | 100.0     | 100.0        | 100.0        |

Table continued.

**Table IV-20 Continued**  
**Seamless OCTG: U.S. producers' U.S. shipments and U.S. imports, by source and period**

Ratio to overall apparent U.S. consumption in percent

| Source                  | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|---------|------|------|------|--------------|--------------|
| U.S. producers          | Ratio   | 35.4 | 42.0 | 41.3 | 43.0         | 40.9         |
| Argentina               | Ratio   | 3.1  | 0.6  | 4.6  | 5.7          | 2.5          |
| Mexico                  | Ratio   | 4.0  | 6.2  | 9.8  | 9.0          | 5.5          |
| Russia                  | Ratio   | 2.7  | 1.0  | 2.7  | 3.6          | 1.0          |
| South Korea, subject    | Ratio   | ***  | ***  | ***  | ***          | ***          |
| Subject sources         | Ratio   | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject | Ratio   | ***  | ***  | ***  | ***          | ***          |
| All other sources       | Ratio   | 12.6 | 9.5  | 13.4 | 10.6         | 14.1         |
| Nonsubject sources      | Ratio   | ***  | ***  | ***  | ***          | ***          |
| All import sources      | Ratio   | 22.8 | 17.5 | 31.8 | 30.4         | 24.1         |
| All sources             | Ratio   | 58.3 | 59.4 | 73.1 | 73.4         | 65.1         |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, and 7304.29.6175, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table IV-21 presents additional detail for U.S. producers' U.S. shipments and U.S. imports of welded OCTG.

**Table IV-21**  
**Welded OCTG: U.S. producers' U.S. shipments and U.S. imports, by source and period**

Quantity in short tons; Shares in percent

| Source                  | Measure  | 2019      | 2020      | 2021    | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|----------|-----------|-----------|---------|--------------|--------------|
| U.S. producers          | Quantity | 1,118,629 | 488,938   | 251,021 | 108,142      | 249,321      |
| Argentina               | Quantity | ---       | ---       | ---     | ---          | ---          |
| Mexico                  | Quantity | 4,446     | 1,191     | ---     | ---          | ---          |
| Russia                  | Quantity | 71,779    | 23,071    | 53,167  | 7,474        | 57,577       |
| South Korea, subject    | Quantity | ***       | ***       | ***     | ***          | ***          |
| Subject sources         | Quantity | ***       | ***       | ***     | ***          | ***          |
| South Korea, nonsubject | Quantity | ***       | ***       | ***     | ***          | ***          |
| All other sources       | Quantity | 574,490   | 264,276   | 173,768 | 67,236       | 292,449      |
| Nonsubject sources      | Quantity | ***       | ***       | ***     | ***          | ***          |
| All import sources      | Quantity | 1,078,543 | 586,041   | 691,177 | 270,086      | 598,086      |
| All sources             | Quantity | 2,197,172 | 1,074,979 | 942,198 | 378,228      | 847,407      |
| U.S. producers          | Share    | 50.9      | 45.5      | 26.6    | 28.6         | 29.4         |
| Argentina               | Share    | ---       | ---       | ---     | ---          | ---          |
| Mexico                  | Share    | 0.2       | 0.1       | ---     | ---          | ---          |
| Russia                  | Share    | 3.3       | 2.1       | 5.6     | 2.0          | 6.8          |
| South Korea, subject    | Share    | ***       | ***       | ***     | ***          | ***          |
| Subject sources         | Share    | ***       | ***       | ***     | ***          | ***          |
| South Korea, nonsubject | Share    | ***       | ***       | ***     | ***          | ***          |
| All other sources       | Share    | 26.1      | 24.6      | 18.4    | 17.8         | 34.5         |
| Nonsubject sources      | Share    | ***       | ***       | ***     | ***          | ***          |
| All import sources      | Share    | 49.1      | 54.5      | 73.4    | 71.4         | 70.6         |
| All sources             | Share    | 100.0     | 100.0     | 100.0   | 100.0        | 100.0        |

Table continued.

**Table IV-21 Continued**  
**Welded OCTG: U.S. producers' U.S. shipments and U.S. imports, by source and period**

Ratio to overall apparent U.S. consumption in percent

| Source                  | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|---------|------|------|------|--------------|--------------|
| U.S. producers          | Ratio   | 21.3 | 18.4 | 7.2  | 7.6          | 10.3         |
| Argentina               | Ratio   | ---  | ---  | ---  | ---          | ---          |
| Mexico                  | Ratio   | 0.1  | 0.0  | ---  | ---          | ---          |
| Russia                  | Ratio   | 1.4  | 0.9  | 1.5  | 0.5          | 2.4          |
| South Korea, subject    | Ratio   | ***  | ***  | ***  | ***          | ***          |
| Subject sources         | Ratio   | ***  | ***  | ***  | ***          | ***          |
| South Korea, nonsubject | Ratio   | ***  | ***  | ***  | ***          | ***          |
| All other sources       | Ratio   | 10.9 | 10.0 | 5.0  | 4.7          | 12.1         |
| Nonsubject sources      | Ratio   | ***  | ***  | ***  | ***          | ***          |
| All import sources      | Ratio   | 20.5 | 22.1 | 19.7 | 19.0         | 24.7         |
| All sources             | Ratio   | 41.7 | 40.6 | 26.9 | 26.6         | 34.9         |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, and 7304.29.6175, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".



## Value

Table IV-22 and figure IV-13 present data on apparent U.S. consumption and U.S. market shares based on value for OCTG. The value of apparent U.S. consumption decreased by 56.2 percent during 2019-20 then increased by 63.9 percent during 2020-21, decreasing overall by 28.3 percent between 2019 and 2021. The value of apparent U.S. consumption was 185.1 percent higher in January-June 2022 than in January-June 2021. U.S. producers' market share based on value increased from 63.0 percent in 2019 to 66.4 percent in 2020 but then decreased to 56.4 percent in 2021, ending 6.6 percentage points lower in 2021 than in 2019. U.S. producers' market share was 0.5 percentage points higher in January-June 2022 than in January-June 2021. Subject import market share increased by \*\*\* percentage points during 2019-21, decreasing from \*\*\* percent in 2019 to \*\*\* percent in 2020 and then increasing to \*\*\* percent in 2021. Subject import market share was \*\*\* percentage points lower in January-June 2022 than in January-June 2021. Nonsubject import market share decreased by \*\*\* percentage points during 2019-21, decreasing from \*\*\* percent in 2019 to \*\*\* percent in 2020 then to \*\*\* percent in 2021. Nonsubject import market share was \*\*\* percentage points higher in January-June 2022 than in January-June 2021.

**Table IV-22****OCTG: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; Shares in percent

| Source                                 | Measure | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|--|---------|-----------|-----------|-----------|--------------|--------------|
| U.S. shipments mills only              | Value   | 4,309,510 | 1,980,332 | 2,736,274 | 989,625      | 2,944,125    |
| U.S. shipments value added to domestic | Value   | 1,074     | 901       | ---       | ---          | ---          |
| U.S. producers fully domestic value    | Value   | 4,310,584 | 1,981,233 | 2,736,274 | 989,625      | 2,944,125    |
| U.S. producers value added to imports  | Value   | 187,430   | 93,248    | 149,553   | 76,726       | 119,453      |
| U.S. producers total                   | Value   | 4,498,014 | 2,074,481 | 2,885,827 | 1,066,351    | 3,063,578    |
| Argentina                              | Value   | 216,803   | 20,331    | 205,993   | 79,842       | 110,312      |
| Mexico                                 | Value   | 350,408   | 222,982   | 488,307   | 153,250      | 273,771      |
| Russia                                 | Value   | 230,773   | 40,376    | 143,613   | 42,669       | 103,597      |
| South Korea, subject                   | Value   | ***       | ***       | ***       | ***          | ***          |
| Subject sources                        | Value   | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject                | Value   | ***       | ***       | ***       | ***          | ***          |
| All other sources                      | Value   | 1,442,969 | 555,561   | 843,183   | 262,873      | 1,083,098    |
| Nonsubject sources                     | Value   | ***       | ***       | ***       | ***          | ***          |
| All import sources                     | Value   | 2,639,123 | 1,048,596 | 2,231,540 | 716,783      | 2,020,588    |
| All sources                            | Value   | 7,137,137 | 3,123,077 | 5,117,367 | 1,783,134    | 5,084,166    |

Table continued.

**Table IV-22 Continued****OCTG: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; Shares in percent

| Source                                 | Measure        | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|--|----------------|-------|-------|-------|--------------|--------------|
| U.S. shipments mills only              | Share of value | 60.4  | 63.4  | 53.5  | 55.5         | 57.9         |
| U.S. shipments value added to domestic | Share of value | 0.0   | 0.0   | ---   | ---          | ---          |
| U.S. producers fully domestic value    | Share of value | 60.4  | 63.4  | 53.5  | 55.5         | 57.9         |
| U.S. producers value added to imports  | Share of value | 2.6   | 3.0   | 2.9   | 4.3          | 2.3          |
| U.S. producers total                   | Share of value | 63.0  | 66.4  | 56.4  | 59.8         | 60.3         |
| Argentina                              | Share of value | 3.0   | 0.7   | 4.0   | 4.5          | 2.2          |
| Mexico                                 | Share of value | 4.9   | 7.1   | 9.5   | 8.6          | 5.4          |
| Russia                                 | Share of value | 3.2   | 1.3   | 2.8   | 2.4          | 2.0          |
| South Korea, subject                   | Share of value | ***   | ***   | ***   | ***          | ***          |
| Subject sources                        | Share of value | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject                | Share of value | ***   | ***   | ***   | ***          | ***          |
| All other sources                      | Share of value | 20.2  | 17.8  | 16.5  | 14.7         | 21.3         |
| Nonsubject sources                     | Share of value | ***   | ***   | ***   | ***          | ***          |
| All import sources                     | Share of value | 37.0  | 33.6  | 43.6  | 40.2         | 39.7         |
| All sources                            | Share of value | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports values are based on the landed duty paid value.

Note: Quantity for U.S. producers' U.S. shipments reflects mill's U.S. shipment quantities. Value for U.S. producers' U.S. shipments reflects OCTG products sold in the United States from domestically manufactured OCTG (including the incremental value from U.S. non-toll processors' heat treatment of domestic OCTG), as well as the incremental value from U.S. processors' heat treatment of imported OCTG. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure IV-13**  
**OCTG: Apparent U.S. consumption based on value, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports values are based on the landed duty paid value.

## Inventory changes

Table IV-23 presents U.S. importers' changes in inventories by source and table IV-24 and figure IV-14 present movements of OCTG reflecting these inventory changes.

**Table IV-23**  
**OCTG: U.S. importers' changes in inventories, by source and period**

Changes in short tons

| Source                  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|------|------|--------------|--------------|
| Argentina               | ▲*** | ▼*** | ▲*** | ▲***         | ▼***         |
| Mexico                  | ▼*** | ▼*** | ▲*** | ▲***         | ▼***         |
| Russia                  | ▼*** | ▼*** | ▼*** | ▲***         | ▼***         |
| South Korea, subject    | ▲*** | ▼*** | ▼*** | ▼***         | ▼***         |
| Subject sources         | ▼*** | ▼*** | ▲*** | ▲***         | ▼***         |
| South Korea, nonsubject | ▼*** | ▲*** | ▼*** | ▼***         | ▲***         |
| All other sources       | ▲*** | ▼*** | ▼*** | ▼***         | ▲***         |
| Nonsubject sources      | ▲*** | ▼*** | ▼*** | ▼***         | ▲***         |
| All import sources      | ▼*** | ▼*** | ▲*** | ▼***         | ▼***         |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

**Table IV-24**

**OCTG: Movements of OCTG and shares reflecting U.S. importers' inventory changes based on quantity data, by source and period**

Quantity in short tons; Shares in percent

| Source                  | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|----------|-------|-------|-------|--------------|--------------|
| U.S. producers          | Quantity | ***   | ***   | ***   | ***          | ***          |
| Argentina               | Quantity | ***   | ***   | ***   | ***          | ***          |
| Mexico                  | Quantity | ***   | ***   | ***   | ***          | ***          |
| Russia                  | Quantity | ***   | ***   | ***   | ***          | ***          |
| South Korea, subject    | Quantity | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Quantity | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Quantity | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Quantity | ***   | ***   | ***   | ***          | ***          |
| Nonsubject sources      | Quantity | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Quantity | ***   | ***   | ***   | ***          | ***          |
| All sources             | Quantity | ***   | ***   | ***   | ***          | ***          |
| U.S. producers          | Share    | ***   | ***   | ***   | ***          | ***          |
| Argentina               | Share    | ***   | ***   | ***   | ***          | ***          |
| Mexico                  | Share    | ***   | ***   | ***   | ***          | ***          |
| Russia                  | Share    | ***   | ***   | ***   | ***          | ***          |
| South Korea, subject    | Share    | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Share    | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Share    | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Share    | ***   | ***   | ***   | ***          | ***          |
| Nonsubject sources      | Share    | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Share    | ***   | ***   | ***   | ***          | ***          |
| All sources             | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, with adjustments to reflect the inventory changes presented in the preceding table. Quantity for U.S. producers' U.S. shipments reflects mills' U.S. shipment quantities.

**Figure IV-14**

**OCTG: Movements of OCTG reflecting U.S. importers' inventory changes, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, with adjustments to reflect the inventory changes presented in the preceding table. Quantity for U.S. producers' U.S. shipments reflects mills' U.S. shipment quantities.





## Part V: Pricing data

### Factors affecting prices

#### Raw material costs

Raw materials, primarily hot-rolled steel or billets (and associated inputs such as coke, scrap, pig iron, and hot-briquetted iron), account for the majority of the cost of OCTG. Raw material costs as a share of cost of goods sold for domestic producers decreased from 51.4 percent in 2019 percent to 47.8 percent in 2020, before rising to 54.6 percent in 2021. Raw material costs as a share of the costs of goods were 59.2 percent in January-June 2022 compared to 50.4 percent in January-June 2021.

Seamless OCTG is manufactured from scrap iron and steel, while welded OCTG is manufactured from hot-rolled coil. Because of this difference in production inputs, Commission questionnaires asked firms about raw material cost trends separately for seamless and welded OCTG.<sup>1</sup>

Regarding the raw material costs for seamless OCTG, 6 U.S. producers and 10 importers reported that such costs had increased, and 3 U.S. producers and 7 importers indicated that such costs had fluctuated since January 2019.<sup>2</sup> Two importers described such costs as unchanged. U.S. producer \*\*\* reported that after a short-term decrease in 2019 and 2020, raw material costs for seamless OCTG steadily increased in 2021 to some of the highest levels in a decade. U.S. producer \*\*\* reported that raw material costs for the materials used to manufacture seamless OCTG varied due to cyclical business conditions. U.S. producer \*\*\* reported that certain base metals used to produce seamless OCTG increased in cost while others decreased in cost. It continued that there is no unifying trend in raw materials costs that affects its selling price for OCTG. U.S. importers \*\*\* indicated that coking coal and iron ore prices had driven OCTG costs up. U.S. producers \*\*\* stated that the costs of scrap, steel billets and/or other inputs had increased. Importers \*\*\* described increased raw material costs as

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<sup>1</sup> Purchasers were also asked if they were familiar with the prices for raw materials used in producing OCTG. Twenty-five stated that they were, and only four stated that they were not.

<sup>2</sup> Seven firms submitted both U.S. producers' questionnaires and importers' questionnaires. Three firms \*\*\* imported from nonsubject countries. Additionally, U.S. producer \*\*\*. For the purposes of this chapter, responses from all these questionnaires are counted.

increasing the price of OCTG. Importer \*\*\* described the cost increases for raw materials in 2022 as “significant.” Importer \*\*\* described rising raw material costs as affecting OCTG availability because pipe producers switched production to other pipe products with higher price increases than OCTG.

Nineteen purchasers indicated that information on raw materials costs had affected their negotiations or contracts for seamless OCTG, while eight indicated that it had not. Most of the nineteen indicated that prices for scrap steel had impacted their contracts or negotiations, and that increased raw material costs had forced them to pay more for OCTG. Five purchasers described having some sort of indexing to raw materials costs in their contracts for OCTG. \*\*\* added that prices for welded OCTG had also impacted prices for seamless OCTG.

Regarding the raw material costs for welded OCTG, 4 U.S. producers and 12 importers reported that such costs had increased, and 6 U.S. producers and 6 importers indicated that such costs had fluctuated since January 2019. One importer described such costs as unchanged. U.S. producer \*\*\* reported that the cost of hot-rolled coil used to produce welded OCTG has quadrupled since 2018 before dropping back to levels that were approximately double 2018 levels. Importer \*\*\* stated that increased raw material costs had led, “at some point,” to a rare situation in which welded OCTG was selling for more than seamless OCTG. Most other producers and importers commenting on the raw material costs for welded OCTG also described increasing costs and added that the effects of those increased costs were increases in OCTG prices, although U.S. producer \*\*\* stated that the cost increases had made its OCTG uncompetitive.

Nineteen purchasers indicated that information on raw materials costs had affected their negotiations or contracts for welded OCTG, while seven indicated that it had not. Those nineteen described primarily tracking hot-rolled coil costs, with several describing the prices of hot-rolled coil as being low in 2019-20 before rising to “unprecedented” (\*\*\*) levels in 2021. Echoing \*\*\* comment above, some purchasers indicated that hot-rolled coil prices had risen to such an extent that welded OCTG prices rose above seamless OCTG prices. Moreover, \*\*\* and \*\*\* indicated that, even with the recent decline in hot-rolled prices, prices of welded OCTG have not decreased. Two purchasers indicated that their welded OCTG contracts were indexed to raw material costs.

The cost of hot-rolled steel, which is used to make welded OCTG, generally decreased from January 2019 until the end of 2020, and then increased substantially until September 2021, at which point it began a decline that has continued into 2022. The cost of scrap, which is

used to make hot rolled billets in the manufacturing of seamless OCTG, followed a directionally similar, but much less pronounced, pattern over the same period (table V-1 and figure V-1).<sup>3</sup>

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<sup>3</sup> As discussed in greater detail in Parts I and II, hot-rolled steel, like seamless and welded OCTG, is subject to tariffs and quantitative restrictions pursuant to Section 232 of the Trade Expansion Act of 1962, as amended. These tariffs were imposed in March 2018.

**Table V-1**  
**Raw material producer price indexes: \*\*\*, by month, January 2019-August 2022**

Price in dollars per short ton

| Year | Month     | Steel scrap No1 heavy melt price | Steel hot-rolled coil price |
|------|-----------|----------------------------------|-----------------------------|
| 2019 | January   | ***                              | ***                         |
| 2019 | February  | ***                              | ***                         |
| 2019 | March     | ***                              | ***                         |
| 2019 | April     | ***                              | ***                         |
| 2019 | May       | ***                              | ***                         |
| 2019 | June      | ***                              | ***                         |
| 2019 | July      | ***                              | ***                         |
| 2019 | August    | ***                              | ***                         |
| 2019 | September | ***                              | ***                         |
| 2019 | October   | ***                              | ***                         |
| 2019 | November  | ***                              | ***                         |
| 2019 | December  | ***                              | ***                         |
| 2020 | January   | ***                              | ***                         |
| 2020 | February  | ***                              | ***                         |
| 2020 | March     | ***                              | ***                         |
| 2020 | April     | ***                              | ***                         |
| 2020 | May       | ***                              | ***                         |
| 2020 | June      | ***                              | ***                         |
| 2020 | July      | ***                              | ***                         |
| 2020 | August    | ***                              | ***                         |
| 2020 | September | ***                              | ***                         |
| 2020 | October   | ***                              | ***                         |
| 2020 | November  | ***                              | ***                         |
| 2020 | December  | ***                              | ***                         |
| 2021 | January   | ***                              | ***                         |
| 2021 | February  | ***                              | ***                         |
| 2021 | March     | ***                              | ***                         |
| 2021 | April     | ***                              | ***                         |
| 2021 | May       | ***                              | ***                         |
| 2021 | June      | ***                              | ***                         |
| 2021 | July      | ***                              | ***                         |
| 2021 | August    | ***                              | ***                         |
| 2021 | September | ***                              | ***                         |
| 2021 | October   | ***                              | ***                         |
| 2021 | November  | ***                              | ***                         |
| 2021 | December  | ***                              | ***                         |
| 2022 | January   | ***                              | ***                         |
| 2022 | February  | ***                              | ***                         |
| 2022 | March     | ***                              | ***                         |
| 2022 | April     | ***                              | ***                         |
| 2022 | May       | ***                              | ***                         |
| 2022 | June      | ***                              | ***                         |
| 2022 | July      | ***                              | ***                         |
| 2022 | August    | ***                              | ***                         |

Source: \*\*\*, downloaded September 22, 2022.

**Figure V-1**  
**Raw material costs: \*\*\*, by month, January 2019-August 2022**

\* \* \* \* \*

In addition to steel, energy consumption accounts for a portion of OCTG production costs. The price of both natural gas and electricity decreased from 2018 to 2020 but then increased in 2021 and have continued to rise in 2022 year-to-date (table V-2).

**Table V-2**  
**Energy prices: Industrial sector average annual natural gas and electricity prices, January 2019-  
 June 2022**

Natural gas prices in dollars per thousand cubic feet; electricity prices in cents per kilowatt hour

| Year           | Industrial sector natural gas price | Industrial sector electricity price |
|----------------|-------------------------------------|-------------------------------------|
| 2019           | 3.90                                | 6.81                                |
| 2020           | 3.32                                | 6.67                                |
| 2021           | 5.50                                | 7.26                                |
| 2022 (Jan-Jun) | 7.51                                | 7.91                                |

Note: Data for 2022 are an average of the first two quarters of data.

Source: EIA, <https://www.eia.gov/outlooks/steo/data/browser/#?v=8> (accessed July 20 and October 5, 2022).

Seamless OCTG producers generally produce their own billets. Billets are not typically sold in the United States. Table V-3 and figure V-2 present one measure of the cost of billets, though it should be noted this may be a proxy for the use of a firm’s billets, not a direct cost of buying them.<sup>4</sup> In general, the cost of billets followed the same pattern as previous raw material costs, i.e., steady or declining costs in 2019 and 2020, followed by large increases in 2021 that extended into 2022.

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<sup>4</sup> *Certain Oil Country Tubular Goods from India, Korea, Philippines, Saudi Arabia, Taiwan, Thailand, Turkey, Ukraine, and Vietnam, Investigation Nos. 731-TA-1215-1217 (Final)*, USITC Publication 4489, September 2014, p. V-3.

**Table V-3**  
**Billet prices: \*\*\*, by month, January 2019- August 2022**

Prices in dollars per short ton

| Year | Month     | Steel billet export prices (f.o.b. main port Turkey) |
|------|-----------|--|
| 2019 | January   | ***  |
| 2019 | February  | ***  |
| 2019 | March     | ***  |
| 2019 | April     | ***  |
| 2019 | May       | ***  |
| 2019 | June      | ***  |
| 2019 | July      | ***  |
| 2019 | August    | ***  |
| 2019 | September | ***  |
| 2019 | October   | ***  |
| 2019 | November  | ***  |
| 2019 | December  | ***  |
| 2020 | January   | ***  |
| 2020 | February  | ***  |
| 2020 | March     | ***  |
| 2020 | April     | ***  |
| 2020 | May       | ***  |
| 2020 | June      | ***  |
| 2020 | July      | ***  |
| 2020 | August    | ***  |
| 2020 | September | ***  |
| 2020 | October   | ***  |
| 2020 | November  | ***  |
| 2020 | December  | ***  |
| 2021 | January   | ***  |
| 2021 | February  | ***  |
| 2021 | March     | ***  |
| 2021 | April     | ***  |
| 2021 | May       | ***  |
| 2021 | June      | ***  |
| 2021 | July      | ***  |
| 2021 | August    | ***  |
| 2021 | September | ***  |
| 2021 | October   | ***  |
| 2021 | November  | ***  |
| 2021 | December  | ***  |
| 2022 | January   | ***  |
| 2022 | February  | ***  |
| 2022 | March     | ***  |
| 2022 | April     | ***  |
| 2022 | May       | ***  |
| 2022 | June      | ***  |
| 2022 | July      | ***  |
| 2022 | August    | ***  |

Source: \*\*\*, retrieved September 22, 2022.

**Figure V-2**  
**Billet prices: \*\*\*, by month, January 2019- August 2022**

\* \* \* \* \*

### **Transportation costs to the U.S. market**

Transportation costs for OCTG shipped from subject countries to the United States averaged 14.2 percent for Argentina, 4.9 percent for Mexico, 11.2 percent for Russia, and 5.9 percent for South Korea during 2021. These estimates were derived from official import data and represent the transportation and other charges on imports.<sup>5</sup>

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<sup>5</sup> The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2021 and then dividing by the customs value based on the HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150.



## **U.S. inland transportation costs**

Eight U.S. producers and 14 importers reported that purchasers typically arrange transportation, while 6 U.S. producers and 9 importers reported that they do themselves. Among importers, nine reported that most of their imported OCTG is shipped from a storage facility, while five reported that most is shipped from the point of importation. Most U.S. producers reported that their U.S. inland transportation costs ranged from 0.1 to 13.0 percent while most importers reported costs of 1.4 to 5.0 percent. A few firms (such as \*\*\*, reported higher costs, such as \*\*\*).

## **Exchange rates**

Exchange rates for the subject countries have showed widely divergent trends since January 2019. From January 2019 to June 2022, the Argentine peso depreciated steadily, with an overall depreciation of 229 percent against the U.S. dollar. Over the same period, the Russian ruble appreciated 15 percent against the U.S. dollar, briefly depreciating sharply in March 2022 before appreciating to even higher levels. The Mexican peso and South Korean won showed steadier depreciation of 4 percent and 14 percent (respectively) against the U.S. dollar overall.<sup>6</sup>

## **Pricing practices**

### **Pricing methods**

Most U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, with a smaller number of firms reporting using contracts and other methods (table V-4).<sup>7</sup> At the hearing, Tenaris stated that it negotiates one price with an individual purchaser, and then provides OCTG at that price regardless of the Tenaris mill that produces the OCTG for that specific purchaser.<sup>8</sup>

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<sup>6</sup> Federal Reserve Bank of St. Louis, economic data, accessed August 10 and October 5, 2022.

<sup>7</sup> Other methods include master distribution agreements. \*\*\*.

<sup>8</sup> Hearing transcript, p. 171 (Zanotti). See also Tenaris's prehearing brief, p. 15.

**Table V-4**

**OCTG: Count of U.S. producers' and importers' reported price setting methods**

| <b>Method</b>              | <b>U.S. producers</b> | <b>Importers</b> |
|----------------------------|-----------------------|------------------|
| Transaction-by-transaction | 13                    | 20               |
| Contract                   | 4                     | 6                |
| Set price list             | 2                     | 1                |
| Other                      | 2                     | 4                |
| Responding firms           | 15                    | 25               |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

Twenty-two purchasers indicated that their purchases involve negotiations with suppliers, while seven indicated that they do not. Purchasers indicated that such negotiations involve price, competitors' prices (for some firms but not others), quality, supply assurance, technical specifications, lead times, and/or technical support. \*\*\* reported that its negotiations center around the OCTG final price plus mark-up. \*\*\* indicated that negotiations occur when prices do not "follow the market," for example, after the filing of the petition in these investigations.

U.S. producers and importers were also asked if there is a price distinction between OCTG sold under contract and in the spot market in the same time period. Ten U.S. producers and 12 importers stated that there were not. Five U.S. producers and 11 importers stated that there were, often noting that spot contracts reflect current market conditions while contracts reflect pricing at the time of the contract (albeit sometimes with an adjustment mechanism). \*\*\* stated that contract prices tend to lag spot prices by three to six months. Two U.S. producers and five importers described contract prices as lower or "more favorable" than spot prices.

U.S. producers sold a plurality of their OCTG under short-term contracts, with most of the rest of their sales under long-term contracts or spot sales. Importers sold mostly under long-term contracts, followed by spot sales, and then short-term contracts (table V-5). Importers from different sources varied in the way they sold OCTG in the U.S. market. Importer \*\*\* reported \*\*\*.

**Table V-5**  
**OCTG: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2021**

Share in percent

| Type of sale         | U.S. producers | Subject importers |
|----------------------|----------------|-------------------|
| Long-term contracts  | ***            | ***               |
| Annual contracts     | ***            | ***               |
| Short-term contracts | ***            | ***               |
| Spot sales           | ***            | ***               |
| Total                | 100.0          | 100.0             |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Because of rounding, figures may not add to the totals shown.

Note: \*\*\*.

U.S. producers and importers described their short-term contracts as generally having a duration of 30-120 days, although a few reported longer durations. Long-term contracts could last as long as seven years. Most U.S. producers' and importers' short-term contracts did not allow price renegotiation, fixed price and quantity, and were not indexed to raw material prices. U.S. producers' and importers' long-term contracts did allow price renegotiation, usually do not fix price or quantity, and are usually indexed to raw material costs. Contracts index to raw materials such as oil prices, scrap prices, and various alloys, or index directly to OCTG prices in publications such as PipeLogix.

Ten purchasers reported that they purchase product daily, nine purchase weekly, six purchase monthly, and three purchase quarterly. Two others purchase as drilling needs require. Most purchasers contact 2 to 10 suppliers before making a purchase, although a few might contact more, and 10 may contact only 1.

Seventeen responding purchasers reported that their purchasing frequency had not changed since 2019. Eleven did report changes in purchasing frequency, usually citing a rising pace of purchases as drilling activity has increased in the last year. Some of these purchasers also described a slowed pace of purchases during the COVID-19 pandemic restrictions in 2020 and 2021.

### **Sales terms and discounts**

Ten U.S. producers and eight importers typically quote prices on an f.o.b. basis, while five U.S. producers and six importers typically quote prices on a delivered basis.

Eight U.S. producers and 12 importers offer no discounts, 2 U.S. producers and 4 importers offer annual discounts, and two U.S. producers offer total volume discounts. Five U.S. producers and 11 importers offered other discounts, usually meaning early payment discounts.

## Price leadership

Purchasers were asked to identify any price leaders in the U.S. market since January 1, 2019. Fourteen purchasers did not name any price leaders, with \*\*\* specifying that there were none. Fifteen purchasers named at least one price leader. Ten of these purchasers named Tenaris (not specifying Tenaris USA or Tenaris Global), seven named U.S. Steel, four named Vallourec, and one purchaser each named Benteler, Sumitomo, and U.S. Tubular.

Purchasers described price leaders as leading in various ways. Purchaser \*\*\* stated that Tenaris introduced the “Rig Direct” model to the U.S. market, selling directly to end users, instead of using distributors, reducing the total cost of Tenaris’s OCTG to purchasers. Other purchasers described the large suppliers (Tenaris, U.S. Steel, and/or Vallourec) as leading through their large market shares or their greater information on the market, so that when they raise or lower prices, other firms follow. \*\*\* stated that Tenaris typically leads price decreases while U.S. Steel typically leads price increases. \*\*\* stated that Tenaris has led prices down to gain market share of both seamless and welded OCTG.

## Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following OCTG products shipped to unrelated U.S. distributors and end users during January 2019-June 2022. The Commission collected price data for seamless casing ranging in size from 5-1/2 inches to 9-5/8 inches in outside diameter and for welded tubing and casing ranging in size from 2-7/8 inches to 9-5/8 inches in outside diameter.

**Product 1.**-- Seamless Casing, Grade L-80, 9 5/8” Outer Diameter, .395-.595” Wall Thickness, Threaded & Coupled, Range 3, sold to end users

**Product 2.**-- Seamless Casing, Grade L-80, 9 5/8” Outer Diameter, .395-.595” Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors

**Product 3.**-- Seamless Casing, Grade K-55, 9 5/8” Outer Diameter, .352-.395” Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors

**Product 4.**-- Seamless Casing, Grade K-55, 9 5/8" Outer Diameter, .352-.395" Wall Thickness, Threaded & Coupled, Range 3, sold to end users

**Product 5.**-- Seamless Casing, Grade P-110, 5 1/2" O.D., 20.0 lbs./ft., Threaded and Coupled, Range 3, sold to end users

**Product 6.**-- Seamless Casing, Grade P-110, 5 1/2" O.D., 23.0 lbs./ft., Threaded and Coupled, Range 3, sold to end users

**Product 7.**-- Welded Casing, Grade P-110, 5 1/2" Outer Diameter, .304-.415" Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors

**Product 8.**-- Welded Casing, Grade J-55, 9 5/8" Outer Diameter, .352-.395" Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors

**Product 9.**-- Welded Tubing, Grade-L-80, 2-7/8" outer Diameter, 0.217" Wall Thickness, Range 2, sold to unrelated distributors

Eight U.S. producers and eight importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>9 10</sup> In 2021, pricing data reported by these firms accounted for approximately 25.0 percent of U.S. producers' U.S. commercial shipments of OCTG, 47.4 percent of U.S. commercial shipments of subject imports from Argentina in 2021, 23.3 percent of such shipments of subject imports from Mexico, 10.1 percent of such shipments of subject imports from Russia, and \*\*\* percent of such shipments of subject imports from South Korea.<sup>11</sup>

Because pricing products from the preliminary-phase investigations resulted in limited price comparisons, the Commission invited parties to provide suggestions for products that would improve pricing data coverage from those products used in the preliminary phase. For the products used in this final phase, products 1 to 4 and products 7-8 were based on products

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<sup>9</sup> Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

<sup>10</sup> The eight U.S. producers who provided pricing data were \*\*\*. \*\*\*. \*\*\*.

<sup>11</sup> Pricing coverage is based on U.S. shipments reported in questionnaires.

suggested by petitioners,<sup>12</sup> and product 7 was based on product 3 from the preliminary phase. Products 5-6 were based on suggestions from Tenaris.<sup>13</sup> Products 8-9 were based on staff contact with \*\*\*.<sup>14</sup> Based on questionnaire comments from parties, staff expected that products 1, 2, 5, and 6 would provide data for OCTG imported from Argentina and Mexico, products 3 and 4 would provide data for OCTG imported from Russia, and products 7, 8, and 9 would provide data for OCTG imported from South Korea. Somewhat more data was provided than these expectations.

Price data for products 1-9 are presented in tables V-6 to V-14 and figures V-3 to V-11. As can be seen in the tables and figures, for most products, prices for OCTG fell in early 2020 when oil and gas prices fell (see Part II and Appendix E), and then rose in 2021 and 2022 as oil and gas prices rose.

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<sup>12</sup> See Petitioners' Comments on Draft Questionnaires, February 15, 2022, pp. 4-5.

<sup>13</sup> See Tenaris's Comments on Draft Questionnaires, February 15, 2022, pp. 1-4.

<sup>14</sup> See \*\*\*. \*\*\*.

**Table V-6**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| <b>Period</b> | <b>US price</b> | <b>US quantity</b> | <b>Argentina price</b> | <b>Argentina quantity</b> | <b>Argentina margin</b> | <b>Mexico price</b> | <b>Mexico quantity</b> | <b>Mexico margin</b> |
|---------------|-----------------|--------------------|------------------------|---------------------------|-------------------------|---------------------|------------------------|----------------------|
| 2019 Q1       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2019 Q2       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2019 Q3       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2019 Q4       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2020 Q1       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2020 Q2       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2020 Q3       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2020 Q4       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2021 Q1       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2021 Q2       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2021 Q3       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2021 Q4       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2022 Q1       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |
| 2022 Q2       | ***             | ***                | ***                    | ***                       | ***                     | ***                 | ***                    | ***                  |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Seamless Casing, Grade L-80, 9 5/8" Outer Diameter, .395-.595" Wall Thickness, Threaded & Coupled, Range 3, sold to end users.

**Figure V-3**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter**

**Price of product 1**

\* \* \* \* \*

**Quantity of product 1**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Seamless Casing, Grade L-80, 9 5/8" Outer Diameter, .395-.595" Wall Thickness, Threaded & Coupled, Range 3, sold to end users.



**Table V-7**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| Period  | US price | US quantity | Argentina price | Argentina quantity | Argentina margin | Mexico price | Mexico quantity | Mexico margin |
|---------|----------|-------------|-----------------|--------------------|------------------|--------------|-----------------|---------------|
| 2019 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2022 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2022 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |

| Period  | Russia price | Russia quantity | Russia margin |
|---------|--------------|-----------------|---------------|
| 2019 Q1 | ***          | ***             | ***           |
| 2019 Q2 | ***          | ***             | ***           |
| 2019 Q3 | ***          | ***             | ***           |
| 2019 Q4 | ***          | ***             | ***           |
| 2020 Q1 | ***          | ***             | ***           |
| 2020 Q2 | ***          | ***             | ***           |
| 2020 Q3 | ***          | ***             | ***           |
| 2020 Q4 | ***          | ***             | ***           |
| 2021 Q1 | ***          | ***             | ***           |
| 2021 Q2 | ***          | ***             | ***           |
| 2021 Q3 | ***          | ***             | ***           |
| 2021 Q4 | ***          | ***             | ***           |
| 2022 Q1 | ***          | ***             | ***           |
| 2022 Q2 | ***          | ***             | ***           |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Seamless Casing, Grade L-80, 9 5/8" Outer Diameter, .395-.595" Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

Note: \*\*\*.

**Figure V-4**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter**

**Price of product 2**

\* \* \* \* \*

**Quantity of product 2**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Seamless Casing, Grade L-80, 9 5/8" Outer Diameter, .395-.595" Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

**Table V-8**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| Period  | US price | US quantity | Mexico price | Mexico quantity | Mexico margin | Russia price | Russia quantity | Russia margin |
|---------|----------|-------------|--------------|-----------------|---------------|--------------|-----------------|---------------|
| 2019 Q1 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2019 Q2 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2019 Q3 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2019 Q4 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2020 Q1 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2020 Q2 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2020 Q3 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2020 Q4 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2021 Q1 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2021 Q2 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2021 Q3 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2021 Q4 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2022 Q1 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2022 Q2 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Seamless Casing, Grade K-55, 9 5/8" Outer Diameter, .352-.395" Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

Note: \*\*\*.

**Figure V-5**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter**

**Price of product 3**

\* \* \* \* \*

**Quantity of product 3**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Seamless Casing, Grade K-55, 9 5/8" Outer Diameter, .352-.395" Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

**Table V-9**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| <b>Period</b> | <b>US price</b> | <b>US quantity</b> | <b>Mexico price</b> | <b>Mexico quantity</b> | <b>Mexico margin</b> |
|---------------|-----------------|--------------------|---------------------|------------------------|----------------------|
| 2019 Q1       | ***             | ***                | ***                 | ***                    | ***                  |
| 2019 Q2       | ***             | ***                | ***                 | ***                    | ***                  |
| 2019 Q3       | ***             | ***                | ***                 | ***                    | ***                  |
| 2019 Q4       | ***             | ***                | ***                 | ***                    | ***                  |
| 2020 Q1       | ***             | ***                | ***                 | ***                    | ***                  |
| 2020 Q2       | ***             | ***                | ***                 | ***                    | ***                  |
| 2020 Q3       | ***             | ***                | ***                 | ***                    | ***                  |
| 2020 Q4       | ***             | ***                | ***                 | ***                    | ***                  |
| 2021 Q1       | ***             | ***                | ***                 | ***                    | ***                  |
| 2021 Q2       | ***             | ***                | ***                 | ***                    | ***                  |
| 2021 Q3       | ***             | ***                | ***                 | ***                    | ***                  |
| 2021 Q4       | ***             | ***                | ***                 | ***                    | ***                  |
| 2022 Q1       | ***             | ***                | ***                 | ***                    | ***                  |
| 2022 Q2       | ***             | ***                | ***                 | ***                    | ***                  |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Seamless Casing, Grade K-55, 9 5/8" Outer Diameter, .352-.395" Wall Thickness, Threaded & Coupled, Range 3, sold to end users.

Note: \*\*\*.

**Figure V-6**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter**

**Price of product 4**

\* \* \* \* \*

**Quantity of product 4**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Seamless Casing, Grade K-55, 9 5/8" Outer Diameter, .352-.395" Wall Thickness, Threaded & Coupled, Range 3, sold to end users.

**Table V-10****OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| Period  | US price | US quantity | Argentina price | Argentina quantity | Argentina margin | Mexico price | Mexico quantity | Mexico margin |
|---------|----------|-------------|-----------------|--------------------|------------------|--------------|-----------------|---------------|
| 2019 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2022 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2022 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |

Source: Compiled from data submitted in response to Commission questionnaires

Note: Product 5: Seamless Casing, Grade P-110, 5 1/2" O.D., 20.0 lbs./ft., Threaded and Coupled, Range 3, sold to end users.

**Figure V-7**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, by source and quarter**

**Price of product 5**

\* \* \* \* \*

**Quantity of product 5**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 5: Seamless Casing, Grade P-110, 5 1/2" O.D., 20.0 lbs./ft., Threaded and Coupled, Range 3, sold to end users.



**Table V-11**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| Period  | US price | US quantity | Argentina Price | Argentina quantity | Argentina margin | Mexico price | Mexico quantity | Mexico margin |
|---------|----------|-------------|-----------------|--------------------|------------------|--------------|-----------------|---------------|
| 2019 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2019 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2020 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q3 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2021 Q4 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2022 Q1 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |
| 2022 Q2 | ***      | ***         | ***             | ***                | ***              | ***          | ***             | ***           |

| Period  | Russia price | Russia quantity | Russia margin | South Korea price | South Korea quantity | South Korea margin |
|---------|--------------|-----------------|---------------|-------------------|----------------------|--------------------|
| 2019 Q1 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q2 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q3 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q4 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q1 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q2 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q3 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q4 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q1 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q2 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q3 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q4 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2022 Q1 | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2022 Q2 | ***          | ***             | ***           | ***               | ***                  | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: Seamless Casing, Grade P-110, 5 1/2" O.D., 23.0 lbs./ft., Threaded and Coupled, Range 3, sold to end users.

Note: \*\*\*.

**Figure V-8**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, by source and quarter**

**Price of product 6**

\* \* \* \* \*

**Quantity of product 6**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: Seamless Casing, Grade P-110, 5 1/2" O.D., 23.0 lbs./ft., Threaded and Coupled, Range 3, sold to end users.

**Table V-12****OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 7 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| Period  | US price | US quantity | Mexico price | Mexico quantity | Mexico margin | South Korea Price | South Korea quantity | South Korea margin |
|---------|----------|-------------|--------------|-----------------|---------------|-------------------|----------------------|--------------------|
| 2019 Q1 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q2 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q3 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q4 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q1 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q2 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q3 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q4 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q1 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q2 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q3 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q4 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2022 Q1 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2022 Q2 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 7: Welded Casing, Grade P-110, 5 ½" Outer Diameter, .304-.415" Wall Thickness, Threaded &amp; Coupled, Range 3, sold to unrelated distributors.

Note: \*\*\*.

**Figure V-9**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 7, by source and quarter**

**Price of product 7**

\* \* \* \* \*

**Quantity of product 7**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 7: Welded Casing, Grade P-110, 5 1/2" Outer Diameter, .304-.415" Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

**Table V-13****OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 8 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| Period  | US price | US quantity | Russia Price | Russia quantity | Russia margin | South Korea price | South Korea quantity | South Korea margin |
|---------|----------|-------------|--------------|-----------------|---------------|-------------------|----------------------|--------------------|
| 2019 Q1 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q2 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q3 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2019 Q4 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q1 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q2 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q3 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2020 Q4 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q1 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q2 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q3 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2021 Q4 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2022 Q1 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |
| 2022 Q2 | ***      | ***         | ***          | ***             | ***           | ***               | ***                  | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 8: Welded Casing, Grade J-55, 9 5/8" Outer Diameter, .352-.395" Wall Thickness, Threaded &amp; Coupled, Range 3, sold to unrelated distributors.

**Figure V-10**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 8, by source and quarter**

**Price of product 8**

\* \* \* \* \*

**Quantity of product 8**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 8: Welded Casing, Grade J-55, 9 5/8" Outer Diameter, .352-.395" Wall Thickness, Threaded & Coupled, Range 3, sold to unrelated distributors.

**Table V-14**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 9 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

| Period  | US price | US quantity | Mexico Price | Mexico quantity | Mexico margin | Russia price | Russia quantity | Russia margin |
|---------|----------|-------------|--------------|-----------------|---------------|--------------|-----------------|---------------|
| 2019 Q1 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2019 Q2 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2019 Q3 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2019 Q4 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2020 Q1 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2020 Q2 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2020 Q3 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2020 Q4 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2021 Q1 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2021 Q2 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2021 Q3 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2021 Q4 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2022 Q1 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |
| 2022 Q2 | ***      | ***         | ***          | ***             | ***           | ***          | ***             | ***           |

| Period  | South Korea price | South Korea quantity | South Korea margin |
|---------|-------------------|----------------------|--------------------|
| 2019 Q1 | ***               | ***                  | ***                |
| 2019 Q2 | ***               | ***                  | ***                |
| 2019 Q3 | ***               | ***                  | ***                |
| 2019 Q4 | ***               | ***                  | ***                |
| 2020 Q1 | ***               | ***                  | ***                |
| 2020 Q2 | ***               | ***                  | ***                |
| 2020 Q3 | ***               | ***                  | ***                |
| 2020 Q4 | ***               | ***                  | ***                |
| 2021 Q1 | ***               | ***                  | ***                |
| 2021 Q2 | ***               | ***                  | ***                |
| 2021 Q3 | ***               | ***                  | ***                |
| 2021 Q4 | ***               | ***                  | ***                |
| 2022 Q1 | ***               | ***                  | ***                |
| 2022 Q2 | ***               | ***                  | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 9: Welded tubing, Grade-L-80, 2-7/8" outer Diameter, 0.217" Wall Thickness, Range 2, sold to unrelated distributors

**Figure V-11**

**OCTG: Weighted-average f.o.b. prices and quantities of domestic and imported product 9, by source and quarter**

**Price of product 9**

\* \* \* \* \*

**Quantity of product 9**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 9: Welded tubing, Grade-L-80, 2-7/8" outer Diameter, 0.217" Wall Thickness, Range 2, sold to unrelated distributors



## Price trends

Prices for the pricing products above increased during January 2019-June 2022. Table V-15 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from 32.1 to 85.3 percent during January 2019-June 2022 while import price increases ranged from \*\*\* to \*\*\* percent for pricing products from Argentina, \*\*\* to \*\*\* for pricing products from Mexico, and \*\*\* to \*\*\* for pricing products from South Korea (subject sources only). No data for the range was available for product from Russia.

**Table V-15**  
**OCTG: Summary of price data, by product and source, January 2019-June 2022**

Quantity in short tons, price in dollars per short ton

| Product   | Source        | Number of quarters | Quantity of shipments | Low price | High price | First quarter price | Last quarter price | Percent change in price over period |
|-----------|---------------|--------------------|-----------------------|-----------|------------|---------------------|--------------------|-------------------------------------|
| Product 1 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 1 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 1 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 1 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 1 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 2 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 2 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 2 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 2 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 2 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 3 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 3 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 3 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 3 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 3 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 4 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 4 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 4 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 4 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 4 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |

Table continued.

**Table V-15 Continued**  
**OCTG: Summary of price data, by product and source, January 2019-June 2022**

Quantity in short tons, price in dollars per short ton

| Product   | Source        | Number of quarters | Quantity of shipments | Low price | High price | First quarter price | Last quarter price | Percent change in price over period |
|-----------|---------------|--------------------|-----------------------|-----------|------------|---------------------|--------------------|-------------------------------------|
| Product 5 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 5 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 5 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 5 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 5 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 6 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 6 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 6 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 6 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 6 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 7 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 7 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 7 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 7 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 7 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 8 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 8 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 8 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 8 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 8 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 9 | United States | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 9 | Argentina     | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 9 | Mexico        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 9 | Russia        | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |
| Product 9 | South Korea   | ***                | ***                   | ***       | ***        | ***                 | ***                | ***                                 |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percent change column is percentage change from the first quarter 2019 to the second quarter 2022.

## Price comparisons

As shown in table V-16, there were \*\*\* instances of underselling (\*\*\* short tons) and \*\*\* instances of overselling (\*\*\* short tons).<sup>15</sup> For seamless OCTG sold to distributors (products 2 and 3), there were \*\*\* instances of underselling (\*\*\* short tons) and \*\*\* instances of overselling (\*\*\* short tons). For seamless OCTG sold to end users (products 1, 4, 5, and 6), there were \*\*\* instances of underselling (\*\*\* short tons) and \*\*\* instances of overselling (\*\*\* short tons). For welded OCTG (products 7, 8, and 9), there were \*\*\* instances of underselling (\*\*\* short tons) and \*\*\* instances of overselling (\*\*\* short tons).

As shown in table V-17, prices for product imported from Argentina were below those for U.S.-produced product in 25 of 44 instances (\*\*\* short tons); margins of underselling ranged from \*\*\* to \*\*\* percent. In the remaining 19 instances (\*\*\* short tons), prices for product from Argentina were between \*\*\* and \*\*\* percent above prices for the domestic product.

Prices for product imported from Mexico were below those for U.S.-produced product in 27 of 65 instances (\*\*\* short tons); margins of underselling ranged from \*\*\* to \*\*\* percent. In the remaining 38 instances (\*\*\* short tons), prices for product from Mexico were between \*\*\* and \*\*\* percent above prices for the domestic product.

Prices for product imported from Russia were below those for U.S.-produced product in 17 of 23 instances (\*\*\* short tons); margins of underselling ranged from \*\*\* to \*\*\* percent. In the remaining 6 instances (\*\*\* short tons), prices for product from Russia were between \*\*\* and \*\*\* percent above prices for the domestic product.

Prices for product imported from South Korea were below those for U.S.-produced product in \*\*\* of \*\*\* instances (\*\*\* short tons); margins of underselling ranged from \*\*\* to \*\*\* percent. In the remaining \*\*\* instances (\*\*\* short tons), prices for product from South Korea were between \*\*\* and \*\*\* percent above prices for the domestic product.

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<sup>15</sup> Several instances of price comparisons occurred at volumes less than 10 tons.

**Table V-16****OCTG: Instances of underselling and overselling and the range and average of margins, by product**

Quantity in short tons; margin in percent

| Product             | Type         | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|---------------------|--------------|--------------------|----------|----------------|------------|------------|
| Product 1           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 2           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 3           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 4           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 5           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 6           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 7           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 8           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 9           | Underselling | ***                | ***      | ***            | ***        | ***        |
| Total, all products | Underselling | ***                | ***      | ***            | ***        | ***        |
| Product 1           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Product 2           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Product 3           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Product 4           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Product 5           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Product 6           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Product 7           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Product 8           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Product 9           | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Total, all products | Overselling  | ***                | ***      | ***            | ***        | ***        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

**Table V-17****OCTG: Instances of underselling and overselling and the range and average of margins, by source**

Quantity in short tons; margin in percent

| Source                     | Type         | Number of quarters | Quantity | Average margin | Min margin | Max margin |
|----------------------------|--------------|--------------------|----------|----------------|------------|------------|
| Argentina                  | Underselling | 25                 | ***      | ***            | ***        | ***        |
| Mexico                     | Underselling | 27                 | ***      | ***            | ***        | ***        |
| Russia                     | Underselling | 17                 | ***      | ***            | ***        | ***        |
| South Korea (subject)      | Underselling | ***                | ***      | ***            | ***        | ***        |
| Total, all subject sources | Underselling | ***                | ***      | 10.8           | 0.0        | 73.1       |
| Argentina                  | Overselling  | 19                 | ***      | ***            | ***        | ***        |
| Mexico                     | Overselling  | 38                 | ***      | ***            | ***        | ***        |
| Russia                     | Overselling  | 6                  | ***      | ***            | ***        | ***        |
| South Korea (subject)      | Overselling  | ***                | ***      | ***            | ***        | ***        |
| Total, all subject sources | Overselling  | ***                | ***      | (13.1)         | (0.2)      | (56.4)     |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

## Lost sales and lost revenue

In the preliminary phase of the investigations, the Commission requested that U.S. producers of OCTG report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of OCTG from Argentina, Mexico, Russia, and/or South Korea during January 2018-June 2021. Eight reported that they had to either reduce prices or roll back announced price increases, and eight reported that they had lost sales.

In the final phase of these investigations, of the 19 responding U.S. producers, 10 reported that they had to either reduce prices or roll back announced price increases, and 10 firms reported that they had lost sales.

Staff contacted 70 purchasers and received responses from 29 purchasers.<sup>16</sup> Responding purchasers reported purchasing nearly 11 million short tons of OCTG during January 2019-June 2022 (table V-18).

Of the 29 responding purchasers, 20 reported that, since 2019, they had purchased imported OCTG from subject countries (11 from Argentina, 16 from Mexico, 10 from Russia, and 13 from South Korea) instead of U.S.-produced product.

Eight purchasers reported that subject import prices were lower than U.S.-produced product, and five purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Twenty purchasers estimated the quantity of OCTG from subject countries instead of domestic sources as totaling 190,814 short tons (tables V-19 and V-20). Purchasers identified availability generally or of specific products as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the seven responding purchasers, three reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; 17 reported that they did not know (tables V-21 and V-22). The reported estimated price reduction ranged from 7 to 35 percent.

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<sup>16</sup> Three purchasers (\*\*\*) submitted lost sales lost revenue survey responses in the preliminary phase but did not submit purchaser questionnaire responses in the final phase.



\*\*\*

Note: Because some of these purchasers are end users and some are distributors, some data in the table may represent shipments of the same OCTG.



**Table V-19**

**OCTG: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in short tons

| <b>Purchaser</b> | <b>Purchased subject imports instead of domestic</b> | <b>Imports priced lower</b> | <b>Choice based on price</b> | <b>Quantity</b> | <b>Explanation</b> |
|------------------|--|-----------------------------|------------------------------|-----------------|--------------------|
| ***              | ***  | ***                         | ***                          | ***             | *** ***            |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |

Table continued.

**Table V-19--Continued**

**OCTG: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in short tons

| <b>Purchaser</b> | <b>Purchased subject imports instead of domestic</b> | <b>Imports priced lower</b> | <b>Choice based on price</b> | <b>Quantity</b> | <b>Explanation</b> |
|------------------|--|-----------------------------|------------------------------|-----------------|--------------------|
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |

Table continued.

**Table V-19--Continued**

**OCTG: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in short tons

| <b>Purchaser</b> | <b>Purchased subject imports instead of domestic</b> | <b>Imports priced lower</b> | <b>Choice based on price</b> | <b>Quantity</b> | <b>Explanation</b> |
|------------------|--|-----------------------------|------------------------------|-----------------|--------------------|
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| ***              | ***  | ***                         | ***                          | ***             | ***                |
| All firms        | Yes--20;<br>No--8                                    | Yes--8;<br>No--11           | Yes--5;<br>No--15            | ***             | NA                 |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: \*\*\*.

**Table V-20**

**OCTG: Purchasers' responses to purchasing subject imports instead of domestic product, by source**

Quantity in short tons

| <b>Source</b>      | <b>Count of purchasers reporting subject instead of domestic</b> | <b>Count of purchasers reported that imports were priced lower</b> | <b>Count of purchasers reporting that price was a primary reason for shift</b> | <b>Quantity</b> |
|--------------------|--|--|--|-----------------|
| Argentina          | 11   | 1  | ---  | ***             |
| Mexico             | 16   | 4  | 2  | ***             |
| Russia             | 10   | 3  | 3  | ***             |
| South Korea        | 13   | 6  | 3  | ***             |
| Any subject source | 20   | 8  | 5  | ***             |

Source: Compiled from data submitted in response to Commission questionnaires.



**Table V-22****OCTG: Purchasers' responses to U.S. producer price reductions, by source**

| <b>Source</b>   | <b>Count of purchasers reporting U.S. producers reduced prices</b> | <b>Average percent of estimated U.S. price reduction</b> | <b>Range of percent of estimated U.S. price reductions</b> |
|-----------------|--|--|--|
| Argentina       | 3  | ***  | ***  |
| Mexico          | 3  | ***  | ***  |
| Russia          | 3  | ***  | ***  |
| South Korea     | 1  | ***  | ***  |
| Subject sources | 3  | ***  | ***  |

Source: Compiled from data submitted in response to Commission questionnaires.

# Part VI: Financial experience of U.S. producers

## Background<sup>1</sup>

Sixteen firms provided usable financial results on their OCTG operations.<sup>2 3</sup> Eleven of the firms provided their financial data on the basis of GAAP, and fourteen of the firms reported financial data on a calendar-year basis.<sup>4</sup> Staff verified the results of the \*\*\*, Tenaris USA, with its corporate records and the verification revisions were incorporated into this report.<sup>5</sup>

Twelve of the firms reported mill production of OCTG. Of these, one mill (\*\*\*) also reported non-toll processing of unfinished OCTG that it \*\*\*, two mills (\*\*\*) reported processing unfinished OCTG on a toll-basis, and one mill (\*\*\*) reported both toll and non-toll processing of unfinished OCTG.<sup>6</sup>

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<sup>1</sup> The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles (“GAAP”), fiscal year (“FY”), net sales (“NS”), cost of goods sold (“COGS”), cost of goods tolled (“COTS”), selling, general, and administrative expenses (“SG&A expenses”), average unit values (“AUVs”), research and development expenses (“R&D expenses”), and return on assets (“ROA”).

<sup>2</sup> \*\*\*.

<sup>3</sup> An additional firm, \*\*\*.

<sup>4</sup> \*\*\* firms reported their financial results on the basis of International Financial Reporting Standards (“IFRS”). \*\*\* reported their financial results on the basis of fiscal years that end on October 31 and September 30, respectively.

<sup>5</sup> Staff verification report, Tenaris USA, September 30, 2022. \*\*\*.

<sup>6</sup> \*\*\*. \*\*\* U.S. producers’ questionnaire, questions II-7, II-13, and II-14.

The remaining four firms do not have mill production of OCTG, but process unfinished OCTG that was not produced internally. Two of these companies reported processing OCTG on a toll-basis, while the other two reported both toll and non-toll processing of OCTG.

## Non-toll operations on OCTG

Figure VI-1 presents the responding mills' and non-toll processors' share of the total net sales quantity in 2021. The figure shows that sales of OCTG are largely concentrated among a few firms. The largest three mills, \*\*\* accounted for approximately \*\*\* of the total net sales quantity in 2021.

**Figure VI-1**  
**OCTG: Share of U.S. mills and non-toll processors' net sales quantity in 2021, by firm**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.



Table VI-1 presents the combined data for U.S. producers' mill operations and non-toll processing operations in relation to OCTG.<sup>7</sup> Tables VI-3 and VI-5 present the data for U.S. producers' mill operations and non-toll processing operations, respectively. Tables VI-2, VI-4, and VI-6 present the corresponding changes in AUVs for tables VI-1, VI-3, and VI-5, respectively. Table VI-7 presents selected company-specific financial data.

**Table VI-1**  
**OCTG: Results of U.S. mills and non-toll processing operations, by item and period**

Quantity in short tons; value in 1,000 dollars; ratios in percent

| Item                       | Measure     | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|-------------|-----------|-----------|-----------|--------------|--------------|
| Total net sales            | Quantity    | 3,216,609 | 1,768,749 | 1,808,460 | 787,864      | 1,333,320    |
| Total net sales            | Value       | 4,587,912 | 2,154,309 | 2,902,119 | 1,076,861    | 3,093,910    |
| Raw material costs         | Value       | 2,284,977 | 1,207,267 | 1,551,104 | 593,016      | 1,417,791    |
| Cost of tolling services   | Value       | 9,522     | 5,282     | 322       | 108          | 4,495        |
| Direct labor costs         | Value       | 464,475   | 287,005   | 282,550   | 121,671      | 207,242      |
| Energy costs               | Value       | 71,465    | 44,775    | 64,921    | 32,463       | 45,938       |
| Other factory costs        | Value       | 1,610,905 | 979,945   | 943,987   | 429,173      | 718,261      |
| COGS                       | Value       | 4,441,344 | 2,524,274 | 2,842,884 | 1,176,431    | 2,393,727    |
| Gross profit or (loss)     | Value       | 146,568   | (369,965) | 59,235    | (99,570)     | 700,183      |
| SG&A expenses              | Value       | 368,497   | 289,288   | 314,133   | 136,735      | 191,913      |
| Operating income or (loss) | Value       | (221,929) | (659,253) | (254,898) | (236,305)    | 508,270      |
| Other expense / (income)   | Value       | ***       | ***       | ***       | ***          | ***          |
| Net income or (loss)       | Value       | ***       | ***       | ***       | ***          | ***          |
| Depreciation/amortization  | Value       | 328,099   | 367,775   | 328,643   | 161,636      | 169,748      |
| Cash flow                  | Value       | ***       | ***       | ***       | ***          | ***          |
| Raw material costs         | Ratio to NS | 49.8      | 56.0      | 53.4      | 55.1         | 45.8         |
| Direct labor costs         | Ratio to NS | 10.1      | 13.3      | 9.7       | 11.3         | 6.7          |
| Energy costs               | Ratio to NS | 1.6       | 2.1       | 2.2       | 3.0          | 1.5          |
| Other factory costs        | Ratio to NS | 35.1      | 45.5      | 32.5      | 39.9         | 23.2         |
| COGS                       | Ratio to NS | 96.8      | 117.2     | 98.0      | 109.2        | 77.4         |
| Gross profit               | Ratio to NS | 3.2       | (17.2)    | 2.0       | (9.2)        | 22.6         |
| SG&A expenses              | Ratio to NS | 8.0       | 13.4      | 10.8      | 12.7         | 6.2          |
| Operating income or (loss) | Ratio to NS | (4.8)     | (30.6)    | (8.8)     | (21.9)       | 16.4         |
| Net income or (loss)       | Ratio to NS | ***       | ***       | ***       | ***          | ***          |

Table continued.

<sup>7</sup> Non-toll processing operations refers to the processing/heat treating of purchased and/or imported unfinished OCTG. Financial results for these operations were reported by \*\*\* and represent a relatively minor share of the combined mill and non-toll processing net sales (\*\*\* percent in 2021). The analysis in this section will, therefore, focus on mill operations.

**Table VI-1 Continued**  
**OCTG: Results of U.S. mills and non-toll processing operations, by item and period**

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

| Item                       | Measure    | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|------------|-------|-------|-------|--------------|--------------|
| Raw material costs         | Share      | 51.4  | 47.8  | 54.6  | 50.4         | 59.2         |
| Cost of tolling services   | Share      | 0.2   | 0.2   | 0.0   | 0.0          | 0.2          |
| Direct labor costs         | Share      | 10.5  | 11.4  | 9.9   | 10.3         | 8.7          |
| Energy costs               | Share      | 1.6   | 1.8   | 2.3   | 2.8          | 1.9          |
| Other factory costs        | Share      | 36.3  | 38.8  | 33.2  | 36.5         | 30.0         |
| COGS                       | Share      | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| Total net sales            | Unit value | 1,426 | 1,218 | 1,605 | 1,367        | 2,320        |
| Raw material costs         | Unit value | 710   | 683   | 858   | 753          | 1,063        |
| Direct labor costs         | Unit value | 144   | 162   | 156   | 154          | 155          |
| Energy costs               | Unit value | 22    | 25    | 36    | 41           | 34           |
| Other factory costs        | Unit value | 501   | 554   | 522   | 545          | 539          |
| COGS                       | Unit value | 1,381 | 1,427 | 1,572 | 1,493        | 1,795        |
| Gross profit or (loss)     | Unit value | 46    | (209) | 33    | (126)        | 525          |
| SG&A expenses              | Unit value | 115   | 164   | 174   | 174          | 144          |
| Operating income or (loss) | Unit value | (69)  | (373) | (141) | (300)        | 381          |
| Net income or (loss)       | Unit value | ***   | ***   | ***   | ***          | ***          |
| Operating losses           | Count      | 10    | 11    | 9     | 9            | 2            |
| Net losses                 | Count      | 10    | 11    | 8     | 9            | 2            |
| Data                       | Count      | 15    | 14    | 14    | 13           | 14           |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COGS. The cost of tolling service is not shown as a ratio to NS or on a unit value basis. Tolling services were not used for the majority of OCTG net sales, therefore ratios and unit values based on total net sales are not meaningful.

Note: \*\*\*. In addition, \*\*\*.

**Table VI-2**  
**OCTG: Changes in AUVs between comparison periods for U.S. mills and non-toll processing operations**

Changes in percent

| Item                | 2019-21 | 2019-20  | 2020-21 | Jan-Jun 2021-22 |
|---------------------|---------|----------|---------|-----------------|
| Total net sales     | ▲ 12.5  | ▼ (14.6) | ▲ 31.8  | ▲ 69.8          |
| Raw material costs  | ▲ 20.7  | ▼ (3.9)  | ▲ 25.7  | ▲ 41.3          |
| Direct labor costs  | ▲ 8.2   | ▲ 12.4   | ▼ (3.7) | ▲ 0.6           |
| Energy costs        | ▲ 61.6  | ▲ 13.9   | ▲ 41.8  | ▼ (16.4)        |
| Other factory costs | ▲ 4.2   | ▲ 10.6   | ▼ (5.8) | ▼ (1.1)         |
| COGS                | ▲ 13.9  | ▲ 3.4    | ▲ 10.1  | ▲ 20.2          |

Table continued.

**Table VI-2 Continued**  
**OCTG: Changes in AUVs between comparison periods for U.S. mills and non-toll processing operations**

Changes in dollars per short ton

| Item                       | 2019-21 | 2019-20 | 2020-21 | Jan-Jun 2021-22 |
|----------------------------|---------|---------|---------|-----------------|
| Total net sales            | ▲ 178   | ▼ (208) | ▲ 387   | ▲ 954           |
| Raw material costs         | ▲ 147   | ▼ (28)  | ▲ 175   | ▲ 311           |
| Direct labor costs         | ▲ 12    | ▲ 18    | ▼ (6)   | ▲ 1             |
| Energy costs               | ▲ 14    | ▲ 3     | ▲ 11    | ▼ (7)           |
| Other factory costs        | ▲ 21    | ▲ 53    | ▼ (32)  | ▼ (6)           |
| COGS                       | ▲ 191   | ▲ 46    | ▲ 145   | ▲ 302           |
| Gross profit or (loss)     | ▼ (13)  | ▼ (255) | ▲ 242   | ▲ 652           |
| SG&A expense               | ▲ 59    | ▲ 49    | ▲ 10    | ▼ (30)          |
| Operating income or (loss) | ▼ (72)  | ▼ (304) | ▲ 232   | ▲ 681           |
| Net income or (loss)       | ***     | ***     | ***     | ***             |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The cost of tolling service is not shown above. Tolling services were not used for the majority of OCTG net sales, therefore unit values based on total net sales are not meaningful.

**Table VI-3**  
**OCTG: Results of U.S. mill operations, by item and period**

Quantity in short tons; value in 1,000 dollars; ratios in percent

| Item                       | Measure     | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|-------------|------|------|------|--------------|--------------|
| Commercial sales           | Quantity    | ***  | ***  | ***  | ***          | ***          |
| Transfers to related firms | Quantity    | ***  | ***  | ***  | ***          | ***          |
| Total net sales            | Quantity    | ***  | ***  | ***  | ***          | ***          |
| Commercial sales           | Value       | ***  | ***  | ***  | ***          | ***          |
| Transfers to related firms | Value       | ***  | ***  | ***  | ***          | ***          |
| Total net sales            | Value       | ***  | ***  | ***  | ***          | ***          |
| Steel sheet or coil        | Value       | ***  | ***  | ***  | ***          | ***          |
| Steel billets              | Value       | ***  | ***  | ***  | ***          | ***          |
| All other raw materials    | Value       | ***  | ***  | ***  | ***          | ***          |
| All raw material costs     | Value       | ***  | ***  | ***  | ***          | ***          |
| Cost of tolling services   | Value       | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Value       | ***  | ***  | ***  | ***          | ***          |
| Energy costs               | Value       | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Value       | ***  | ***  | ***  | ***          | ***          |
| COGS                       | Value       | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)     | Value       | ***  | ***  | ***  | ***          | ***          |
| SG&A expenses              | Value       | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss) | Value       | ***  | ***  | ***  | ***          | ***          |
| Other expense/(income)     | Value       | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)       | Value       | ***  | ***  | ***  | ***          | ***          |
| Depreciation/amortization  | Value       | ***  | ***  | ***  | ***          | ***          |
| Cash flow                  | Value       | ***  | ***  | ***  | ***          | ***          |
| Steel sheet or coil        | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Steel billets              | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| All other raw materials    | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| All raw material costs     | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Energy costs               | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| COGS                       | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Gross profit               | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| SG&A expense               | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss) | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)       | Ratio to NS | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-3 Continued**  
**OCTG: Results of U.S. mill operations, by item and period**

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

| Item                       | Measure    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|------------|------|------|------|--------------|--------------|
| Steel sheet or coil        | Share      | ***  | ***  | ***  | ***          | ***          |
| Steel billets              | Share      | ***  | ***  | ***  | ***          | ***          |
| All other raw materials    | Share      | ***  | ***  | ***  | ***          | ***          |
| All raw material costs     | Share      | ***  | ***  | ***  | ***          | ***          |
| Cost of tolling services   | Share      | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Share      | ***  | ***  | ***  | ***          | ***          |
| Energy costs               | Share      | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Share      | ***  | ***  | ***  | ***          | ***          |
| COGS                       | Share      | ***  | ***  | ***  | ***          | ***          |
| Total net sales            | Unit value | ***  | ***  | ***  | ***          | ***          |
| All raw material costs     | Unit value | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Unit value | ***  | ***  | ***  | ***          | ***          |
| Energy costs               | Unit value | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Unit value | ***  | ***  | ***  | ***          | ***          |
| Cost of goods sold         | Unit value | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)     | Unit value | ***  | ***  | ***  | ***          | ***          |
| SG&A expenses              | Unit value | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss) | Unit value | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)       | Unit value | ***  | ***  | ***  | ***          | ***          |
| Operating losses           | Count      | ***  | ***  | ***  | ***          | ***          |
| Net losses                 | Count      | ***  | ***  | ***  | ***          | ***          |
| Data                       | Count      | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COGS. The individual components of raw materials (i.e., steel sheet/coil, steel billets, all other raw materials) and cost of tolling services are not shown as ratios to NS or as unit values. The individual components of raw materials and tolling services were each used for a fluctuating portion of total OCTG net sales. Therefore, ratios and unit values for these items that are based on total net sales are not meaningful.

Note: Both \*\*\*.

**Table VI-4**  
**OCTG: Changes in AUVs between comparison periods for U.S. mill operations**

Changes in percent

| Item                   | 2019-21 | 2019-20 | 2020-21 | Jan-Jun<br>2021-22 |
|------------------------|---------|---------|---------|--------------------|
| Total net sales        | ***     | ***     | ***     | ***                |
| All raw material costs | ***     | ***     | ***     | ***                |
| Direct labor costs     | ***     | ***     | ***     | ***                |
| Energy costs           | ***     | ***     | ***     | ***                |
| Other factory costs    | ***     | ***     | ***     | ***                |
| COGS                   | ***     | ***     | ***     | ***                |

Table continued.

**Table VI-4 Continued**  
**OCTG: Changes in AUVs between comparison periods for U.S. mill operations**

Changes in dollars per short ton

| Item                       | 2019-21 | 2019-20 | 2020-21 | Jan-Jun<br>2021-22 |
|----------------------------|---------|---------|---------|--------------------|
| Total net sales            | ***     | ***     | ***     | ***                |
| All raw material costs     | ***     | ***     | ***     | ***                |
| Direct labor costs         | ***     | ***     | ***     | ***                |
| Energy costs               | ***     | ***     | ***     | ***                |
| Other factory costs        | ***     | ***     | ***     | ***                |
| COGS                       | ***     | ***     | ***     | ***                |
| Gross profit or (loss)     | ***     | ***     | ***     | ***                |
| SG&A expense               | ***     | ***     | ***     | ***                |
| Operating income or (loss) | ***     | ***     | ***     | ***                |
| Net income or (loss)       | ***     | ***     | ***     | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The cost of tolling service is not shown above. Tolling services were not used for the majority of OCTG net sales, therefore unit values based on total net sales are not meaningful.

**Table VI-5**  
**OCTG: Results of U.S. non-toll processing operations, by item and period**

Quantity in short tons; value in 1,000 dollars; ratios in percent

| Item                       | Measure     | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|-------------|------|------|------|--------------|--------------|
| Total net sales            | Quantity    | ***  | ***  | ***  | ***          | ***          |
| Total net sales            | Value       | ***  | ***  | ***  | ***          | ***          |
| Unfinished OCTG            | Value       | ***  | ***  | ***  | ***          | ***          |
| All other raw materials    | Value       | ***  | ***  | ***  | ***          | ***          |
| All raw material costs     | Value       | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Value       | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Value       | ***  | ***  | ***  | ***          | ***          |
| COGS                       | Value       | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)     | Value       | ***  | ***  | ***  | ***          | ***          |
| SG&A expenses              | Value       | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss) | Value       | ***  | ***  | ***  | ***          | ***          |
| Other expense / (income)   | Value       | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)       | Value       | ***  | ***  | ***  | ***          | ***          |
| Depreciation/amortization  | Value       | ***  | ***  | ***  | ***          | ***          |
| Cash flow                  | Value       | ***  | ***  | ***  | ***          | ***          |
| Unfinished OCTG            | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| All other raw materials    | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| All raw material costs     | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| COGS                       | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Gross profit               | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| SG&A expense               | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss) | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)       | Ratio to NS | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-5 Continued****OCTG: Results of U.S. non-toll processing operations, by item and period, by item and period**

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

| Item                       | Measure    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|------------|------|------|------|--------------|--------------|
| Unfinished OCTG            | Share      | ***  | ***  | ***  | ***          | ***          |
| All other raw materials    | Share      | ***  | ***  | ***  | ***          | ***          |
| All raw material costs     | Share      | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Share      | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Share      | ***  | ***  | ***  | ***          | ***          |
| COGS                       | Share      | ***  | ***  | ***  | ***          | ***          |
| Total net sales            | Unit value | ***  | ***  | ***  | ***          | ***          |
| Unfinished OCTG            | Unit value | ***  | ***  | ***  | ***          | ***          |
| All other raw materials    | Unit value | ***  | ***  | ***  | ***          | ***          |
| All raw material costs     | Unit value | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Unit value | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Unit value | ***  | ***  | ***  | ***          | ***          |
| Cost of goods sold         | Unit value | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)     | Unit value | ***  | ***  | ***  | ***          | ***          |
| SG&A expenses              | Unit value | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss) | Unit value | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)       | Unit value | ***  | ***  | ***  | ***          | ***          |
| Operating losses           | Count      | ***  | ***  | ***  | ***          | ***          |
| Net losses                 | Count      | ***  | ***  | ***  | ***          | ***          |
| Data                       | Count      | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COGS. \*\*\*.



**Table VI-6**  
**OCTG: Changes in AUVs between comparison periods for U.S. non-toll processing operations**

Changes in percent

| Item                    | 2019-21 | 2019-20 | 2020-21 | Jan-Jun<br>2021-22 |
|-------------------------|---------|---------|---------|--------------------|
| Total net sales         | ***     | ***     | ***     | ***                |
| Unfinished OCTG         | ***     | ***     | ***     | ***                |
| All other raw materials | ***     | ***     | ***     | ***                |
| All raw material costs  | ***     | ***     | ***     | ***                |
| Direct labor costs      | ***     | ***     | ***     | ***                |
| Other factory costs     | ***     | ***     | ***     | ***                |
| COGS                    | ***     | ***     | ***     | ***                |

Table continued.

**Table VI-6 Continued**  
**OCTG: Changes in AUVs between comparison periods for U.S. non-toll processing operations**

Changes in dollars per short ton

| Item                       | 2019-21 | 2019-20 | 2020-21 | Jan-Jun<br>2021-22 |
|----------------------------|---------|---------|---------|--------------------|
| Total net sales            | ***     | ***     | ***     | ***                |
| Unfinished OCTG            | ***     | ***     | ***     | ***                |
| All other raw materials    | ***     | ***     | ***     | ***                |
| All raw material costs     | ***     | ***     | ***     | ***                |
| Direct labor costs         | ***     | ***     | ***     | ***                |
| Other factory costs        | ***     | ***     | ***     | ***                |
| COGS                       | ***     | ***     | ***     | ***                |
| Gross profit or (loss)     | ***     | ***     | ***     | ***                |
| SG&A expense               | ***     | ***     | ***     | ***                |
| Operating income or (loss) | ***     | ***     | ***     | ***                |
| Net income or (loss)       | ***     | ***     | ***     | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table VI-7**  
**OCTG: U.S. mills and non-toll processing total net sales quantity, by firm and period**

**Net sales quantity**

Quantity in short tons

| Firm                    | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-----------|-----------|-----------|--------------|--------------|
| Axis                    | ***       | ***       | ***       | ***          | ***          |
| Benteler                | ***       | ***       | ***       | ***          | ***          |
| Borusan                 | ***       | ***       | ***       | ***          | ***          |
| EVRAZ                   | ***       | ***       | ***       | ***          | ***          |
| PTC Tubular             | ***       | ***       | ***       | ***          | ***          |
| SeAH Steel              | ***       | ***       | ***       | ***          | ***          |
| Tenaris USA/IPSCO       | ***       | ***       | ***       | ***          | ***          |
| Timken Steel            | ***       | ***       | ***       | ***          | ***          |
| U.S. Steel              | ***       | ***       | ***       | ***          | ***          |
| Vallourec               | ***       | ***       | ***       | ***          | ***          |
| Welded Tube USA         | ***       | ***       | ***       | ***          | ***          |
| Wheatland Tube          | ***       | ***       | ***       | ***          | ***          |
| All mills               | ***       | ***       | ***       | ***          | ***          |
| All non-toll processors | ***       | ***       | ***       | ***          | ***          |
| All firms               | 3,216,609 | 1,768,749 | 1,808,460 | 787,864      | 1,333,320    |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing total net sales value, by firm and period**

**Net sales value**

Value in 1,000 dollars

| Firm                    | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-----------|-----------|-----------|--------------|--------------|
| Axis                    | ***       | ***       | ***       | ***          | ***          |
| Benteler                | ***       | ***       | ***       | ***          | ***          |
| Borusan                 | ***       | ***       | ***       | ***          | ***          |
| EVRAZ                   | ***       | ***       | ***       | ***          | ***          |
| PTC Tubular             | ***       | ***       | ***       | ***          | ***          |
| SeAH Steel              | ***       | ***       | ***       | ***          | ***          |
| Tenaris USA/IPSCO       | ***       | ***       | ***       | ***          | ***          |
| Timken Steel            | ***       | ***       | ***       | ***          | ***          |
| U.S. Steel              | ***       | ***       | ***       | ***          | ***          |
| Vallourec               | ***       | ***       | ***       | ***          | ***          |
| Welded Tube USA         | ***       | ***       | ***       | ***          | ***          |
| Wheatland Tube          | ***       | ***       | ***       | ***          | ***          |
| All mills               | ***       | ***       | ***       | ***          | ***          |
| All non-toll processors | ***       | ***       | ***       | ***          | ***          |
| All firms               | 4,587,912 | 2,154,309 | 2,902,119 | 1,076,861    | 3,093,910    |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing cost of goods sold (“COGS”), by firm and period**

**COGS**

Value in 1,000 dollars

| Firm                    | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-----------|-----------|-----------|--------------|--------------|
| Axis                    | ***       | ***       | ***       | ***          | ***          |
| Benteler                | ***       | ***       | ***       | ***          | ***          |
| Borusan                 | ***       | ***       | ***       | ***          | ***          |
| EVRAZ                   | ***       | ***       | ***       | ***          | ***          |
| PTC Tubular             | ***       | ***       | ***       | ***          | ***          |
| SeAH Steel              | ***       | ***       | ***       | ***          | ***          |
| Tenaris USA/IPSCO       | ***       | ***       | ***       | ***          | ***          |
| Timken Steel            | ***       | ***       | ***       | ***          | ***          |
| U.S. Steel              | ***       | ***       | ***       | ***          | ***          |
| Vallourec               | ***       | ***       | ***       | ***          | ***          |
| Welded Tube USA         | ***       | ***       | ***       | ***          | ***          |
| Wheatland Tube          | ***       | ***       | ***       | ***          | ***          |
| All mills               | ***       | ***       | ***       | ***          | ***          |
| All non-toll processors | ***       | ***       | ***       | ***          | ***          |
| All firms               | 4,416,666 | 2,496,261 | 2,842,210 | 1,176,431    | 2,366,452    |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing gross profit or (loss), by firm and period**

**Gross profit or (loss)**

Value in 1,000 dollars

| Firm                    | 2019    | 2020      | 2021   | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|---------|-----------|--------|--------------|--------------|
| Axis                    | ***     | ***       | ***    | ***          | ***          |
| Benteler                | ***     | ***       | ***    | ***          | ***          |
| Borusan                 | ***     | ***       | ***    | ***          | ***          |
| EVRAZ                   | ***     | ***       | ***    | ***          | ***          |
| PTC Tubular             | ***     | ***       | ***    | ***          | ***          |
| SeAH Steel              | ***     | ***       | ***    | ***          | ***          |
| Tenaris USA/IPSCO       | ***     | ***       | ***    | ***          | ***          |
| Timken Steel            | ***     | ***       | ***    | ***          | ***          |
| U.S. Steel              | ***     | ***       | ***    | ***          | ***          |
| Vallourec               | ***     | ***       | ***    | ***          | ***          |
| Welded Tube USA         | ***     | ***       | ***    | ***          | ***          |
| Wheatland Tube          | ***     | ***       | ***    | ***          | ***          |
| All mills               | ***     | ***       | ***    | ***          | ***          |
| All non-toll processors | ***     | ***       | ***    | ***          | ***          |
| All firms               | 146,568 | (369,965) | 59,235 | (99,570)     | 700,183      |

Table continued.

**Table VI-7 Continued**

**OCTG: U.S. mills and non-toll processing selling, general, and administrative (“SG&A”) expenses, by firm and period**

**SG&A expenses**

Value in 1,000 dollars

| <b>Firm</b>             | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|-------------|-------------|-------------|---------------------|---------------------|
| Axis                    | ***         | ***         | ***         | ***                 | ***                 |
| Benteler                | ***         | ***         | ***         | ***                 | ***                 |
| Borusan                 | ***         | ***         | ***         | ***                 | ***                 |
| EVRAZ                   | ***         | ***         | ***         | ***                 | ***                 |
| PTC Tubular             | ***         | ***         | ***         | ***                 | ***                 |
| SeAH Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Tenaris USA/IPSCO       | ***         | ***         | ***         | ***                 | ***                 |
| Timken Steel            | ***         | ***         | ***         | ***                 | ***                 |
| U.S. Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Vallourec               | ***         | ***         | ***         | ***                 | ***                 |
| Welded Tube USA         | ***         | ***         | ***         | ***                 | ***                 |
| Wheatland Tube          | ***         | ***         | ***         | ***                 | ***                 |
| All mills               | ***         | ***         | ***         | ***                 | ***                 |
| All non-toll processors | ***         | ***         | ***         | ***                 | ***                 |
| All firms               | 368,497     | 289,288     | 314,133     | 136,735             | 191,913             |

Table continued.

**Table VI-7 Continued**

**OCTG: U.S. mills and non-toll processing operating income or (loss), by firm and period**

**Operating income or (loss)**

Value in 1,000 dollars

| <b>Firm</b>             | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|-------------|-------------|-------------|---------------------|---------------------|
| Axis                    | ***         | ***         | ***         | ***                 | ***                 |
| Benteler                | ***         | ***         | ***         | ***                 | ***                 |
| Borusan                 | ***         | ***         | ***         | ***                 | ***                 |
| EVRAZ                   | ***         | ***         | ***         | ***                 | ***                 |
| PTC Tubular             | ***         | ***         | ***         | ***                 | ***                 |
| SeAH Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Tenaris USA/IPSCO       | ***         | ***         | ***         | ***                 | ***                 |
| Timken Steel            | ***         | ***         | ***         | ***                 | ***                 |
| U.S. Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Vallourec               | ***         | ***         | ***         | ***                 | ***                 |
| Welded Tube USA         | ***         | ***         | ***         | ***                 | ***                 |
| Wheatland Tube          | ***         | ***         | ***         | ***                 | ***                 |
| All mills               | ***         | ***         | ***         | ***                 | ***                 |
| All non-toll processors | ***         | ***         | ***         | ***                 | ***                 |
| All firms               | (221,929)   | (659,253)   | (254,898)   | (236,305)           | 508,270             |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing net income or (loss), by firm and period**

**Net income or (loss)**

Value in 1,000 dollars

| Firm                    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|------|------|--------------|--------------|
| Axis                    | ***  | ***  | ***  | ***          | ***          |
| Benteler                | ***  | ***  | ***  | ***          | ***          |
| Borusan                 | ***  | ***  | ***  | ***          | ***          |
| EVRAZ                   | ***  | ***  | ***  | ***          | ***          |
| PTC Tubular             | ***  | ***  | ***  | ***          | ***          |
| SeAH Steel              | ***  | ***  | ***  | ***          | ***          |
| Tenaris USA/IPSCO       | ***  | ***  | ***  | ***          | ***          |
| Timken Steel            | ***  | ***  | ***  | ***          | ***          |
| U.S. Steel              | ***  | ***  | ***  | ***          | ***          |
| Vallourec               | ***  | ***  | ***  | ***          | ***          |
| Welded Tube USA         | ***  | ***  | ***  | ***          | ***          |
| Wheatland Tube          | ***  | ***  | ***  | ***          | ***          |
| All mills               | ***  | ***  | ***  | ***          | ***          |
| All non-toll processors | ***  | ***  | ***  | ***          | ***          |
| All firms               | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing ratio of COGS to net sales value, by firm and period**

**COGS to net sales ratio**

Ratios in percent

| Firm                    | 2019 | 2020  | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|-------|------|--------------|--------------|
| Axis                    | ***  | ***   | ***  | ***          | ***          |
| Benteler                | ***  | ***   | ***  | ***          | ***          |
| Borusan                 | ***  | ***   | ***  | ***          | ***          |
| EVRAZ                   | ***  | ***   | ***  | ***          | ***          |
| PTC Tubular             | ***  | ***   | ***  | ***          | ***          |
| SeAH Steel              | ***  | ***   | ***  | ***          | ***          |
| Tenaris USA/IPSCO       | ***  | ***   | ***  | ***          | ***          |
| Timken Steel            | ***  | ***   | ***  | ***          | ***          |
| U.S. Steel              | ***  | ***   | ***  | ***          | ***          |
| Vallourec               | ***  | ***   | ***  | ***          | ***          |
| Welded Tube USA         | ***  | ***   | ***  | ***          | ***          |
| Wheatland Tube          | ***  | ***   | ***  | ***          | ***          |
| All mills               | ***  | ***   | ***  | ***          | ***          |
| All non-toll processors | ***  | ***   | ***  | ***          | ***          |
| All firms               | 96.8 | 117.2 | 98.0 | 109.2        | 77.4         |

Table continued.

**Table VI-7 Continued**

**OCTG: U.S. mills and non-toll processing ratio of gross profit or (loss) to net sales value, by firm and period**

**Gross profit or (loss) to net sales ratio**

Ratios in percent

| <b>Firm</b>             | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|-------------|-------------|-------------|---------------------|---------------------|
| Axis                    | ***         | ***         | ***         | ***                 | ***                 |
| Benteler                | ***         | ***         | ***         | ***                 | ***                 |
| Borusan                 | ***         | ***         | ***         | ***                 | ***                 |
| EVRAZ                   | ***         | ***         | ***         | ***                 | ***                 |
| PTC Tubular             | ***         | ***         | ***         | ***                 | ***                 |
| SeAH Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Tenaris USA/IPSCO       | ***         | ***         | ***         | ***                 | ***                 |
| Timken Steel            | ***         | ***         | ***         | ***                 | ***                 |
| U.S. Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Vallourec               | ***         | ***         | ***         | ***                 | ***                 |
| Welded Tube USA         | ***         | ***         | ***         | ***                 | ***                 |
| Wheatland Tube          | ***         | ***         | ***         | ***                 | ***                 |
| All mills               | ***         | ***         | ***         | ***                 | ***                 |
| All non-toll processors | ***         | ***         | ***         | ***                 | ***                 |
| All firms               | 3.2         | (17.2)      | 2.0         | (9.2)               | 22.6                |

Table continued.

**Table VI-7 Continued**

**OCTG: U.S. mills and non-toll processing ratio of SG&A expenses to net sales value, by firm and period**

**SG&A expenses to net sales ratio**

Ratios in percent

| <b>Firm</b>             | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|-------------|-------------|-------------|---------------------|---------------------|
| Axis                    | ***         | ***         | ***         | ***                 | ***                 |
| Benteler                | ***         | ***         | ***         | ***                 | ***                 |
| Borusan                 | ***         | ***         | ***         | ***                 | ***                 |
| EVRAZ                   | ***         | ***         | ***         | ***                 | ***                 |
| PTC Tubular             | ***         | ***         | ***         | ***                 | ***                 |
| SeAH Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Tenaris USA/IPSCO       | ***         | ***         | ***         | ***                 | ***                 |
| Timken Steel            | ***         | ***         | ***         | ***                 | ***                 |
| U.S. Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Vallourec               | ***         | ***         | ***         | ***                 | ***                 |
| Welded Tube USA         | ***         | ***         | ***         | ***                 | ***                 |
| Wheatland Tube          | ***         | ***         | ***         | ***                 | ***                 |
| All mills               | ***         | ***         | ***         | ***                 | ***                 |
| All non-toll processors | ***         | ***         | ***         | ***                 | ***                 |
| All firms               | 8.0         | 13.4        | 10.8        | 12.7                | 6.2                 |

Table continued.

**Table VI-7 Continued**

**OCTG: U.S. mills and non-toll processing ratio of operating income or (loss) to net sales value, by firm and period**

**Operating income or (loss) to net sales ratio**

Ratios in percent

| <b>Firm</b>             | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|-------------|-------------|-------------|---------------------|---------------------|
| Axis                    | ***         | ***         | ***         | ***                 | ***                 |
| Benteler                | ***         | ***         | ***         | ***                 | ***                 |
| Borusan                 | ***         | ***         | ***         | ***                 | ***                 |
| EVRAZ                   | ***         | ***         | ***         | ***                 | ***                 |
| PTC Tubular             | ***         | ***         | ***         | ***                 | ***                 |
| SeAH Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Tenaris USA/IPSCO       | ***         | ***         | ***         | ***                 | ***                 |
| Timken Steel            | ***         | ***         | ***         | ***                 | ***                 |
| U.S. Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Vallourec               | ***         | ***         | ***         | ***                 | ***                 |
| Welded Tube USA         | ***         | ***         | ***         | ***                 | ***                 |
| Wheatland Tube          | ***         | ***         | ***         | ***                 | ***                 |
| All mills               | ***         | ***         | ***         | ***                 | ***                 |
| All non-toll processors | ***         | ***         | ***         | ***                 | ***                 |
| All firms               | (4.8)       | (30.6)      | (8.8)       | (21.9)              | 16.4                |

Table continued.

**Table VI-7 Continued**

**OCTG: U.S. mills and non-toll processing ratio of net income or (loss) to net sales value, by firm and period**

**Net income or (loss) to net sales ratio**

Ratios in percent

| <b>Firm</b>             | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|-------------|-------------|-------------|---------------------|---------------------|
| Axis                    | ***         | ***         | ***         | ***                 | ***                 |
| Benteler                | ***         | ***         | ***         | ***                 | ***                 |
| Borusan                 | ***         | ***         | ***         | ***                 | ***                 |
| EVRAZ                   | ***         | ***         | ***         | ***                 | ***                 |
| PTC Tubular             | ***         | ***         | ***         | ***                 | ***                 |
| SeAH Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Tenaris USA/IPSCO       | ***         | ***         | ***         | ***                 | ***                 |
| Timken Steel            | ***         | ***         | ***         | ***                 | ***                 |
| U.S. Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Vallourec               | ***         | ***         | ***         | ***                 | ***                 |
| Welded Tube USA         | ***         | ***         | ***         | ***                 | ***                 |
| Wheatland Tube          | ***         | ***         | ***         | ***                 | ***                 |
| All mills               | ***         | ***         | ***         | ***                 | ***                 |
| All non-toll processors | ***         | ***         | ***         | ***                 | ***                 |
| All firms               | ***         | ***         | ***         | ***                 | ***                 |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit net sales value, by firm and period**

**Unit net sales value**

Unit values in dollars per short ton

| Firm                    | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-------|-------|-------|--------------|--------------|
| Axis                    | ***   | ***   | ***   | ***          | ***          |
| Benteler                | ***   | ***   | ***   | ***          | ***          |
| Borusan                 | ***   | ***   | ***   | ***          | ***          |
| EVRAZ                   | ***   | ***   | ***   | ***          | ***          |
| PTC Tubular             | ***   | ***   | ***   | ***          | ***          |
| SeAH Steel              | ***   | ***   | ***   | ***          | ***          |
| Tenaris USA/IPSCO       | ***   | ***   | ***   | ***          | ***          |
| Timken Steel            | ***   | ***   | ***   | ***          | ***          |
| U.S. Steel              | ***   | ***   | ***   | ***          | ***          |
| Vallourec               | ***   | ***   | ***   | ***          | ***          |
| Welded Tube USA         | ***   | ***   | ***   | ***          | ***          |
| Wheatland Tube          | ***   | ***   | ***   | ***          | ***          |
| All mills               | ***   | ***   | ***   | ***          | ***          |
| All non-toll processors | ***   | ***   | ***   | ***          | ***          |
| All firms               | 1,426 | 1,218 | 1,605 | 1,367        | 2,320        |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit raw material cost, by firm and period**

**Unit raw material costs**

Unit values in dollars per short ton

| Firm                    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|------|------|--------------|--------------|
| Axis                    | ***  | ***  | ***  | ***          | ***          |
| Benteler                | ***  | ***  | ***  | ***          | ***          |
| Borusan                 | ***  | ***  | ***  | ***          | ***          |
| EVRAZ                   | ***  | ***  | ***  | ***          | ***          |
| PTC Tubular             | ***  | ***  | ***  | ***          | ***          |
| SeAH Steel              | ***  | ***  | ***  | ***          | ***          |
| Tenaris USA/IPSCO       | ***  | ***  | ***  | ***          | ***          |
| Timken Steel            | ***  | ***  | ***  | ***          | ***          |
| U.S. Steel              | ***  | ***  | ***  | ***          | ***          |
| Vallourec               | ***  | ***  | ***  | ***          | ***          |
| Welded Tube USA         | ***  | ***  | ***  | ***          | ***          |
| Wheatland Tube          | ***  | ***  | ***  | ***          | ***          |
| All mills               | ***  | ***  | ***  | ***          | ***          |
| All non-toll processors | ***  | ***  | ***  | ***          | ***          |
| All firms               | 710  | 683  | 858  | 753          | 1,063        |

Table continued.



**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit direct labor cost, by firm and period**

**Unit direct labor costs**

Unit values in dollars per short ton

| Firm                    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|------|------|--------------|--------------|
| Axis                    | ***  | ***  | ***  | ***          | ***          |
| Benteler                | ***  | ***  | ***  | ***          | ***          |
| Borusan                 | ***  | ***  | ***  | ***          | ***          |
| EVRAZ                   | ***  | ***  | ***  | ***          | ***          |
| PTC Tubular             | ***  | ***  | ***  | ***          | ***          |
| SeAH Steel              | ***  | ***  | ***  | ***          | ***          |
| Tenaris USA/IPSCO       | ***  | ***  | ***  | ***          | ***          |
| Timken Steel            | ***  | ***  | ***  | ***          | ***          |
| U.S. Steel              | ***  | ***  | ***  | ***          | ***          |
| Vallourec               | ***  | ***  | ***  | ***          | ***          |
| Welded Tube USA         | ***  | ***  | ***  | ***          | ***          |
| Wheatland Tube          | ***  | ***  | ***  | ***          | ***          |
| All mills               | ***  | ***  | ***  | ***          | ***          |
| All non-toll processors | ***  | ***  | ***  | ***          | ***          |
| All firms               | 144  | 162  | 156  | 154          | 155          |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit other factory costs, by firm and period**

**Unit other factory costs**

Unit values in dollars per short ton

| Firm                    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|------|------|--------------|--------------|
| Axis                    | ***  | ***  | ***  | ***          | ***          |
| Benteler                | ***  | ***  | ***  | ***          | ***          |
| Borusan                 | ***  | ***  | ***  | ***          | ***          |
| EVRAZ                   | ***  | ***  | ***  | ***          | ***          |
| PTC Tubular             | ***  | ***  | ***  | ***          | ***          |
| SeAH Steel              | ***  | ***  | ***  | ***          | ***          |
| Tenaris USA/IPSCO       | ***  | ***  | ***  | ***          | ***          |
| Timken Steel            | ***  | ***  | ***  | ***          | ***          |
| U.S. Steel              | ***  | ***  | ***  | ***          | ***          |
| Vallourec               | ***  | ***  | ***  | ***          | ***          |
| Welded Tube USA         | ***  | ***  | ***  | ***          | ***          |
| Wheatland Tube          | ***  | ***  | ***  | ***          | ***          |
| All mills               | ***  | ***  | ***  | ***          | ***          |
| All non-toll processors | ***  | ***  | ***  | ***          | ***          |
| All firms               | 501  | 554  | 522  | 545          | 539          |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit COGS, by firm and period**

**Unit COGS**

Unit values in dollars per short ton

| Firm                    | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|-------|-------|-------|--------------|--------------|
| Axis                    | ***   | ***   | ***   | ***          | ***          |
| Benteler                | ***   | ***   | ***   | ***          | ***          |
| Borusan                 | ***   | ***   | ***   | ***          | ***          |
| EVRAZ                   | ***   | ***   | ***   | ***          | ***          |
| PTC Tubular             | ***   | ***   | ***   | ***          | ***          |
| SeAH Steel              | ***   | ***   | ***   | ***          | ***          |
| Tenaris USA/IPSCO       | ***   | ***   | ***   | ***          | ***          |
| Timken Steel            | ***   | ***   | ***   | ***          | ***          |
| U.S. Steel              | ***   | ***   | ***   | ***          | ***          |
| Vallourec               | ***   | ***   | ***   | ***          | ***          |
| Welded Tube USA         | ***   | ***   | ***   | ***          | ***          |
| Wheatland Tube          | ***   | ***   | ***   | ***          | ***          |
| All mills               | ***   | ***   | ***   | ***          | ***          |
| All non-toll processors | ***   | ***   | ***   | ***          | ***          |
| All firms               | 1,381 | 1,427 | 1,572 | 1,493        | 1,795        |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit gross profit or (loss), by firm and period**

**Unit gross profit or (loss)**

Unit values in dollars per short ton

| Firm                    | 2019 | 2020  | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|-------|------|--------------|--------------|
| Axis                    | ***  | ***   | ***  | ***          | ***          |
| Benteler                | ***  | ***   | ***  | ***          | ***          |
| Borusan                 | ***  | ***   | ***  | ***          | ***          |
| EVRAZ                   | ***  | ***   | ***  | ***          | ***          |
| PTC Tubular             | ***  | ***   | ***  | ***          | ***          |
| SeAH Steel              | ***  | ***   | ***  | ***          | ***          |
| Tenaris USA/IPSCO       | ***  | ***   | ***  | ***          | ***          |
| Timken Steel            | ***  | ***   | ***  | ***          | ***          |
| U.S. Steel              | ***  | ***   | ***  | ***          | ***          |
| Vallourec               | ***  | ***   | ***  | ***          | ***          |
| Welded Tube USA         | ***  | ***   | ***  | ***          | ***          |
| Wheatland Tube          | ***  | ***   | ***  | ***          | ***          |
| All mills               | ***  | ***   | ***  | ***          | ***          |
| All non-toll processors | ***  | ***   | ***  | ***          | ***          |
| All firms               | 46   | (209) | 33   | (126)        | 525          |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit SG&A expenses, by firm and period**

**Unit SG&A expenses**

Unit values in dollars per short ton

| Firm                    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|------|------|--------------|--------------|
| Axis                    | ***  | ***  | ***  | ***          | ***          |
| Benteler                | ***  | ***  | ***  | ***          | ***          |
| Borusan                 | ***  | ***  | ***  | ***          | ***          |
| EVRAZ                   | ***  | ***  | ***  | ***          | ***          |
| PTC Tubular             | ***  | ***  | ***  | ***          | ***          |
| SeAH Steel              | ***  | ***  | ***  | ***          | ***          |
| Tenaris USA/IPSCO       | ***  | ***  | ***  | ***          | ***          |
| Timken Steel            | ***  | ***  | ***  | ***          | ***          |
| U.S. Steel              | ***  | ***  | ***  | ***          | ***          |
| Vallourec               | ***  | ***  | ***  | ***          | ***          |
| Welded Tube USA         | ***  | ***  | ***  | ***          | ***          |
| Wheatland Tube          | ***  | ***  | ***  | ***          | ***          |
| All mills               | ***  | ***  | ***  | ***          | ***          |
| All non-toll processors | ***  | ***  | ***  | ***          | ***          |
| All firms               | 115  | 164  | 174  | 174          | 144          |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit operating income or (loss), by firm and period**

**Unit operating income or (loss)**

Unit values in dollars per short ton

| Firm                    | 2019 | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|------|-------|-------|--------------|--------------|
| Axis                    | ***  | ***   | ***   | ***          | ***          |
| Benteler                | ***  | ***   | ***   | ***          | ***          |
| Borusan                 | ***  | ***   | ***   | ***          | ***          |
| EVRAZ                   | ***  | ***   | ***   | ***          | ***          |
| PTC Tubular             | ***  | ***   | ***   | ***          | ***          |
| SeAH Steel              | ***  | ***   | ***   | ***          | ***          |
| Tenaris USA/IPSCO       | ***  | ***   | ***   | ***          | ***          |
| Timken Steel            | ***  | ***   | ***   | ***          | ***          |
| U.S. Steel              | ***  | ***   | ***   | ***          | ***          |
| Vallourec               | ***  | ***   | ***   | ***          | ***          |
| Welded Tube USA         | ***  | ***   | ***   | ***          | ***          |
| Wheatland Tube          | ***  | ***   | ***   | ***          | ***          |
| All mills               | ***  | ***   | ***   | ***          | ***          |
| All non-toll processors | ***  | ***   | ***   | ***          | ***          |
| All firms               | (69) | (373) | (141) | (300)        | 381          |

Table continued.

**Table VI-7 Continued**  
**OCTG: U.S. mills and non-toll processing unit net income or (loss), by firm and period**

**Unit net income or (loss)**

Unit values in dollars per short ton

| <b>Firm</b>             | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|-------------|-------------|-------------|---------------------|---------------------|
| Axis                    | ***         | ***         | ***         | ***                 | ***                 |
| Benteler                | ***         | ***         | ***         | ***                 | ***                 |
| Borusan                 | ***         | ***         | ***         | ***                 | ***                 |
| EVRAZ                   | ***         | ***         | ***         | ***                 | ***                 |
| PTC Tubular             | ***         | ***         | ***         | ***                 | ***                 |
| SeAH Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Tenaris USA/IPSCO       | ***         | ***         | ***         | ***                 | ***                 |
| Timken Steel            | ***         | ***         | ***         | ***                 | ***                 |
| U.S. Steel              | ***         | ***         | ***         | ***                 | ***                 |
| Vallourec               | ***         | ***         | ***         | ***                 | ***                 |
| Welded Tube USA         | ***         | ***         | ***         | ***                 | ***                 |
| Wheatland Tube          | ***         | ***         | ***         | ***                 | ***                 |
| All mills               | ***         | ***         | ***         | ***                 | ***                 |
| All non-toll processors | ***         | ***         | ***         | ***                 | ***                 |
| All firms               | ***         | ***         | ***         | ***                 | ***                 |

Source: Compiled from data submitted in response to Commission questionnaires.

**Net sales**

Of the twelve mills included in this section, four firms (\*\*\*) reported net sales of only seamless OCTG, six firms (\*\*\*) reported net sales of only welded OCTG, and two firms (\*\*\*) reported net sales of both.<sup>8</sup>

As seen in table VI-1, the combined non-toll net sales quantity declined irregularly from 3.2 million short tons in 2019 to 1.8 million short tons in 2021, and was higher in January-June 2022 than in January-June 2021. Similarly, the combined non-toll net sales value declined irregularly from \$4.6 billion in 2019 to \$2.9 billion in 2021, and was higher in January-June 2022 than in January-June 2021.<sup>9</sup>

<sup>8</sup> \*\*\*, \*\*\* U.S. producers' questionnaire response, sections II-13 and III-9c. Therefore, when discussing mill operations, \*\*\* will be considered a welded OCTG producer.

<sup>9</sup> Revenue primarily reflects commercial sales, but also includes transfers to related firms reported by \*\*\*.

The decline in net sales volume between 2019 and 2020 was experienced universally, with all U.S. mills reporting a decrease during this time. However, between 2020 and 2021 the company-specific net sales volume trends varied, with seven of the mills reporting an increase and the remaining five reporting a decrease. Between 2020 and 2021, four of the six mills that produce only welded OCTG reported a decrease in net sales volume, while all four mills that produced only seamless OCTG reported an increase. For the companies that produced both welded and seamless OCTG, one company reported an increase in its net sales volume, and one reported a decrease. However, both companies reported a decrease in their welded OCTG sales volume and an increase in their seamless OCTG sales volume.<sup>10</sup>

The combined non-toll net sales AUV declined from \$1,426 in 2019 to a period low of \$1,218 in 2020 but increased to \$1,605 in 2021; it was noticeably higher during the first half of 2022, at \$2,320, than it was during the first half of 2021, at \$1,367. As shown in table VI-7, the company-specific trends for net sales AUVs were mostly uniform. With the exception of \*\*\*, all of the U.S. mills' net sales AUVs followed similar directional trends. That is, they decreased from 2019 to 2020, increased in 2021 to levels above 2019, and were higher in January-June 2022 than in January-June 2021.

Table VI-8 presents the U.S. mills' net sales of welded and seamless OCTG, the net sales AUVs of each, and their relative shares of the net sales quantity and value. Net sales of both welded and seamless OCTG decreased from 2019 to 2020, however in 2021 the net sales quantity and value of seamless OCTG increased, whereas the net sales quantity and value of welded OCTG decreased. The net sales quantity and value of both welded and seamless OCTG were higher in the first half of 2022 than in the first half of 2021. The net sales AUVs of both welded and seamless OCTG decreased from 2019 to 2020, increased in 2021, and were higher in interim 2022 than in interim 2021.

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<sup>10</sup> \*\*\*. \*\*\* U.S. producers' questionnaire responses, section III-9c.

**Table VI-8**  
**OCTG: U.S. mills' net sales by product type and period**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent

| Item          | Measure           | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------|-------------------|-------|-------|-------|--------------|--------------|
| Welded OCTG   | Quantity          | ***   | ***   | ***   | ***          | ***          |
| Seamless OCTG | Quantity          | ***   | ***   | ***   | ***          | ***          |
| All OCTG      | Quantity          | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG   | Value             | ***   | ***   | ***   | ***          | ***          |
| Seamless OCTG | Value             | ***   | ***   | ***   | ***          | ***          |
| All OCTG      | Value             | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG   | Unit value        | 1,318 | 1,085 | 1,460 | 1,137        | 1,951        |
| Seamless OCTG | Unit value        | 1,499 | 1,281 | 1,636 | 1,410        | 2,434        |
| All OCTG      | Unit value        | 1,427 | 1,217 | 1,605 | 1,359        | 2,318        |
| Welded OCTG   | Share of quantity | 39.6  | 32.7  | 17.5  | 18.8         | 24.1         |
| Seamless OCTG | Share of quantity | 60.4  | 67.3  | 82.5  | 81.2         | 75.9         |
| All OCTG      | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |
| Welded OCTG   | Share of value    | 36.6  | 29.2  | 15.9  | 15.7         | 20.3         |
| Seamless OCTG | Share of value    | 63.4  | 70.8  | 84.1  | 84.3         | 79.7         |
| All OCTG      | Share of value    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

During the annual-year periods, welded OCTG accounted for a smaller and decreasing share of the mills' total net sales quantity, while seamless OCTG accounted for a larger and increasing share. During the interim periods, welded OCTG's share of total OCTG net sales volume increased, but seamless OCTG still accounted for the majority of sales.

## Cost of goods sold and gross profit or loss

### Raw materials

As seen in table VI-1, the total raw material cost for combined non-toll operations is the largest component of cost of goods sold (“COGS”) during most of the reporting period, ranging from 47.8 percent (2020) to 59.2 percent (interim 2022) of total COGS. On a per-short ton basis, raw material costs decreased from 2019 to 2020, increased in 2021, and were higher in January-June 2022 than in January-June 2021. On a company-specific basis, as shown in table VI-7, all U.S. mills except \*\*\* reported a decline in their per-short ton raw material costs from 2019 to 2020 and all U.S. mills except \*\*\* reported an increase in their per-short ton raw material costs in 2021.<sup>11 12 13</sup>

Raw materials for U.S. mills consist of steel sheet or coil (for the production of welded OCTG), steel billets (for the production of seamless OCTG), and a small amount of other raw

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<sup>11</sup> \*\*\*. U.S. producers’ questionnaire responses, sections III-7 and III-8.

<sup>12</sup> \*\*\*. \*\*\* U.S. producers’ questionnaire responses, section III-9c.

<sup>13</sup> \*\*\*. \*\*\* U.S. producers’ questionnaire response, follow-up to section III-9a.

material inputs.<sup>14</sup> Tables VI-9 and VI-10 provide the U.S. mills' raw material costs for welded OCTG and seamless OCTG, respectively. As a ratio to the respective net sales values, the cost of steel sheet or coil for welded OCTG was consistently and noticeably higher than the cost of steel billets for seamless OCTG.

**Table VI-9**  
**Welded OCTG: U.S. mills' net sales and main raw material input cost, by item and period**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratios in percent

| Item                | Measure     | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------------|-------------|-------|-------|-------|--------------|--------------|
| Total net sales     | Quantity    | ***   | ***   | ***   | ***          | ***          |
| Total net sales     | Value       | ***   | ***   | ***   | ***          | ***          |
| Steel sheet or coil | Value       | ***   | ***   | ***   | ***          | ***          |
| Total net sales     | Unit value  | 1,318 | 1,085 | 1,460 | 1,137        | 1,951        |
| Steel sheet or coil | Unit value  | 786   | 699   | 1,053 | 795          | 1,385        |
| Steel sheet or coil | Ratio to NS | 59.7  | 64.5  | 72.2  | 70.0         | 71.0         |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table VI-10**  
**Seamless OCTG: U.S. mills' net sales and main raw material input cost, by item and period**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratios in percent

| Item            | Measure     | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------|-------------|-------|-------|-------|--------------|--------------|
| Total net sales | Quantity    | ***   | ***   | ***   | ***          | ***          |
| Total net sales | Value       | ***   | ***   | ***   | ***          | ***          |
| Steel billets   | Value       | ***   | ***   | ***   | ***          | ***          |
| Total net sales | Unit value  | 1,499 | 1,281 | 1,636 | 1,410        | 2,434        |
| Steel billets   | Unit value  | 586   | 597   | 777   | 697          | 910          |
| Steel billets   | Ratio to NS | 39.1  | 46.7  | 47.5  | 49.4         | 37.4         |

Source: Compiled from data submitted in response to Commission questionnaires.

As seen in table VI-9, the per-short ton raw material cost for steel sheet or coil, the main input for welded OCTG, declined from \$786 in 2019 to \$699 in 2020 but increased to \$1,053 in 2021. It was \$1,385 per short ton in the first half of 2022, compared to \$795 during the first half of 2021.

Table VI-10 shows that the per-short ton raw material cost of steel billets, the main input for seamless OCTG, increased from \$586 in 2019 to \$777 in 2021. It was \$910 per short ton in the first half of 2022, compared to \$697 during the first half of 2022.

<sup>14</sup> Raw material costs for non-toll processors consist primarily of unfinished OCTG.



## **Direct labor, other factory costs, tolling fees, and energy costs**

As a share of total COGS, non-toll direct labor was between 8.7 percent (January-June 2022) and 11.4 percent (2020). The per-short ton cost of direct labor increased from 2019 to 2020, decreased in 2021, and was slightly higher in interim 2021 than in interim 2022.<sup>15</sup>

Other factory costs, the second largest component of COGS, accounted for between 30.0 percent (interim 2022) and 38.8 percent (2020) of total COGS during the period for which data were collected. On an actual basis, other factory costs decreased from 2019 to 2021, and were higher in interim 2022 than in interim 2021. Other factory costs, both as a ratio to net sales and on a per-short ton basis, increased from 2019 to 2020, decreased in 2021, and were lower in interim 2022 than in interim 2021.

On a company-specific basis, 9 of 12 mills reported an increase in their other factory cost AUVs from 2019 and 2020 and 8 of 12 reported a decrease from 2020 to 2021. When comparing the interim periods, 7 of 12 mills reported lower other factory cost AUVs during the first half of 2022 than during the first half of 2021. In general, the producers of welded OCTG reported lower per-short ton other factory costs than the companies that either exclusively or mostly produced seamless OCTG.<sup>16</sup>

## **COGS and gross profit or loss**

The non-toll producers' total COGS decreased from \$4.4 billion in 2019 to \$2.5 billion in 2020, increased to \$2.8 billion in 2021, and was higher in the first half of 2022 (\$2.4 billion) than it was during the same period in 2021 (\$1.2 billion). Between 2019 and 2020, while total COGS decreased noticeably, it did not keep pace with the sharper decrease in total net sales value. Conversely, between 2020 and 2021 the total net sales value increased more than the increase in COGS. This resulted in the non-toll producers' gross profit decreasing from \$146.6 million in 2019 to a gross loss of \$370.0 million in 2020, before improving to a gross profit of \$59.2 million. Between the comparable interim periods, the increase in net sales value outpaced the

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<sup>15</sup> \*\*\*. \*\*\* U.S. producers' questionnaires, section III-9a.

<sup>16</sup> Firms were asked to report energy costs and any fees paid for tolling services as separate line items within COGS. These items accounted for a minor share of COGS, with energy costs representing between 1.6 and 2.8 percent of total COGS and tolling fees representing 0.01 and 0.2 percent.

increase in total COGS, which resulted in the gross loss of \$99.6 million experienced in interim 2021 improving to a gross profit of \$700.2 million in interim 2022.<sup>17</sup>

As seen in table VI-7, all U.S. mills reported a decline in their gross profit from 2019 to 2020, 9 of 12 mills reported an improvement in their gross profit or loss between 2020 and 2021, and all mills had higher gross profit in interim 2022 than they did in interim 2021.<sup>18</sup>

While all mills reported a decrease in gross profit in 2020 and the majority reported an increase in gross profit between 2020 and 2021, the magnitude of the changes varied. Welded-only producers accounted for \*\*\* percent of the decrease in the mills' gross profit between 2019 and 2020, but only accounted for \*\*\* percent of the improvement in 2021. Seamless-only producers accounted for \*\*\* percent of the decrease in the mills' gross profit from 2019 to 2020, but accounted for \*\*\* percent of the increase in 2021. The combined producers accounted for \*\*\* percent of the decrease in gross profit between 2019 and 2020, but accounted for \*\*\* percent of the increase in 2021. Between the comparable interim periods, welded-only producers accounted for \*\*\* percent of the increase in gross profit in interim 2022 when compared with interim 2021, seamless-only producers accounted for \*\*\* percent, and the combined producers accounted for the remaining \*\*\* percent.<sup>19</sup>

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<sup>17</sup> The combined gross profit for U.S. mills, non-toll processing operations, and toll processors was \$\*\*\* in 2019, \*\*\* in 2020, \$\*\*\* in 2021, \*\*\* in January-June 2021, and \$\*\*\* in January-June 2022. The gross profit margin for the combined data of the U.S. mills, non-toll processing operations, and toll processors was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in January-June 2021, and \*\*\* percent in January-June 2022. Calculated from tables VI-1 and VI-12.

<sup>18</sup> The companies that reported a decrease in gross profit between 2020 and 2021 were \*\*\*.

<sup>19</sup> The average ratio of gross profit to net sales for the six U.S. mills that exclusively produce welded OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022.

The average ratio of gross profit to net sales for the four U.S. mills that exclusively produce seamless OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022.

The average ratio of gross profit to net sales for the two U.S. mills that produced both welded and seamless OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022. Calculated from table VI-7.

## SG&A expenses and operating income or loss

The non-toll producers' total SG&A expenses decreased from 2019 to 2020, increased in 2021, and were higher in January-June 2022 than in January-June 2021. As a ratio to net sales, SG&A expenses increased irregularly from 2019 to 2021 but were lower in January-June 2022 than in January-June 2021.

The non-toll producers' operating loss worsened from a loss of \$221.9 million in 2019 to a loss of \$659.3 million in 2020 but improved somewhat to a loss of \$254.9 million in 2021. The non-toll producers' experienced an operating loss of \$236.3 million in January-June 2021, but this improved to an operating income of \$508.3 million in January-June 2022. The operating margin (operating income or loss divided by total net sales) exhibited the same directional trends. On a company-specific basis, as shown in table VI-7, all of the U.S. mills' operating income or losses worsened from 2019 to 2020, but the majority (9 of 12) of the mills' operating incomes or losses improved in 2021.<sup>20</sup> All but one mill reported an improvement in their operating incomes or losses in the first half of 2022 compared to the first half of 2021.<sup>21</sup>

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<sup>20</sup> The combined operating income for U.S. mills, non-toll processing operations, and toll processors was \*\*\* in 2019, \*\*\* in 2020, \*\*\* in 2021, \*\*\* in January-June 2021, and \*\*\* in January-June 2022. The operating income margin for the combined data of the U.S. mills, non-toll processing operations, and toll processors was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in January-June 2021, and \*\*\* percent in January-June 2022. Calculated from tables VI-1 and VI-12.

<sup>21</sup> The average ratio of operating income to net sales for the six U.S. mills that exclusively produce welded OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022.

The average ratio of operating income to net sales for the four U.S. mills that exclusively produce seamless OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022.

The average ratio of operating income to net sales for the two U.S. mills that produced both welded and seamless OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022. Calculated from table VI-7.

## All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income, which are often allocated to the product line from high levels in the corporation. In table VI-1 these items are aggregated and only the net amount is shown. The U.S. mills and non-toll processors' net amount of other expenses increased from \$\*\*\* in 2019 to \$\*\*\* in 2020, but decreased to \$\*\*\* in 2021. The vast majority of the increase in other expenses in 2020 is attributable to \*\*\*.<sup>22</sup>

The non-toll producers' net loss worsened from a loss of \$\*\*\* in 2019 to a net loss of \$\*\*\* in 2020 but improved somewhat in 2021 to a net loss of \$\*\*\*. In January-June 2021 the non-toll producers' reported a net loss of \$\*\*\* and in January-June 2022 this improved to a net income of \$\*\*\*. The net loss margin (net loss divided by total net sales) exhibited the same directional trends.<sup>23 24</sup>

Table VI-11 presents the mills' and non-toll processors' narrative responses regarding the effects on financial performance of COVID-19.

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<sup>22</sup> \*\*\* U.S. producers' questionnaire response, section III-10.

<sup>23</sup> The average ratio of net income to net sales for the six U.S. mills that exclusively produce welded OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022.

The average ratio of net income to net sales for the four U.S. mills that exclusively produce seamless OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022.

The average ratio of net income to net sales for the two U.S. mills that produced both welded and seamless OCTG was \*\*\* percent in 2019, \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in interim 2021, and \*\*\* percent in interim 2022. Calculated from table VI-7.

<sup>24</sup> Due to the differences in cost structures between U.S. mills and non-toll processing operations and the fluctuations in product mix between welded and seamless OCTG, a variance analysis would not be meaningful and is, therefore, not shown.

**Table VI-11**

**OCTG: U.S. producers' narrative responses relating to COVID-19 pandemic effects on U.S. producers' financial performance**

| <b>Firm</b>          | <b>Narrative response</b> |
|----------------------|---------------------------|
| Axis                 | ***                       |
| Benteler             | ***                       |
| Borusan              | ***                       |
| EVRAZ                | ***                       |
| PTC Tubular          | ***                       |
| RDT                  | ***                       |
| SeAH Steel           | ***                       |
| Tejas Tubular        | ***                       |
| Tenaris<br>USA/IPSCO | ***                       |
| Timken Steel         | ***                       |
| U.S. Steel           | ***                       |
| Vallourec            | ***                       |
| Welded Tube<br>USA   | ***                       |
| Wheatland Tube       | ***                       |

Source: Compiled from data submitted in response to Commission questionnaires.

## Tolling operations

In a tolling arrangement, the tollee provides the input material (retaining title to the input) to the toller. The toller, in turn, upgrades the input to the desired form and quality. In the case of OCTG, the toll processing that is performed is typically that of heat-treating of unfinished OCTG (green tube) to its final API grade. Six firms reported data on their tolling operations.<sup>25</sup> Figure VI-2 presents each responding toll processors' share of the net quantity tolled in 2021. Table VI-12 presents aggregated data on the toll-processors' operations in relation to OCTG, while table VI-13 presents the corresponding changes in the AUVs from table VI-12. Table VI-14 presents selected company-specific financial data.

**Figure VI-2**  
**OCTG: Share of net quantity tolled in 2021, by firm**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: \*\*\*.

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<sup>25</sup> \*\*\*. \*\*\* U.S. producers' questionnaire response, sections III-9e and III-14.

**Table VI-12**  
**OCTG: Results of operations of U.S. toll processors, by item and period**

Quantity in short tons; value in 1,000 dollars; ratios in percent; shares in percent; unit values in dollars per short ton; count in number of firms reporting

| Item                                 | Measure                  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|--------------------------------------|--------------------------|------|------|------|--------------|--------------|
| Net tolling quantity                 | Quantity                 | ***  | ***  | ***  | ***          | ***          |
| Net tolling revenue                  | Value                    | ***  | ***  | ***  | ***          | ***          |
| Raw materials not supplied by tollee | Value                    | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs                   | Value                    | ***  | ***  | ***  | ***          | ***          |
| Other factory costs                  | Value                    | ***  | ***  | ***  | ***          | ***          |
| Cost of goods tolled ("COTS")        | Value                    | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)               | Value                    | ***  | ***  | ***  | ***          | ***          |
| G&A expenses                         | Value                    | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss)           | Value                    | ***  | ***  | ***  | ***          | ***          |
| Raw materials not supplied by tollee | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs                   | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Other factory costs                  | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| COTS                                 | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)               | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| G&A expenses                         | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss)           | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Raw materials not supplied by tollee | Share                    | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs                   | Share                    | ***  | ***  | ***  | ***          | ***          |
| Other factory costs                  | Share                    | ***  | ***  | ***  | ***          | ***          |
| COTS                                 | Share                    | ***  | ***  | ***  | ***          | ***          |
| Net tolling revenue                  | Unit value               | ***  | ***  | ***  | ***          | ***          |
| Raw materials not supplied by tollee | Unit value               | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs                   | Unit value               | ***  | ***  | ***  | ***          | ***          |
| Other factory costs                  | Unit value               | ***  | ***  | ***  | ***          | ***          |
| COTS                                 | Unit value               | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)               | Unit value               | ***  | ***  | ***  | ***          | ***          |
| G&A expenses                         | Unit value               | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss)           | Unit value               | ***  | ***  | ***  | ***          | ***          |
| Operating losses                     | Count                    | ***  | ***  | ***  | ***          | ***          |
| Data                                 | Count                    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COTS.

**Table VI-13**  
**OCTG: U.S. toll processors' changes in average unit values between comparison periods**

Changes in percent

| Item                                 | 2019-21 | 2019-20 | 2020-21 | Jan-Jun<br>2021-22 |
|--------------------------------------|---------|---------|---------|--------------------|
| Net tolling revenue                  | ***     | ***     | ***     | ***                |
| Raw materials not supplied by tollee | ***     | ***     | ***     | ***                |
| Direct labor costs                   | ***     | ***     | ***     | ***                |
| Other factory costs                  | ***     | ***     | ***     | ***                |
| COTS                                 | ***     | ***     | ***     | ***                |

Table continued.

**Table VI-13 Continued**  
**OCTG: U.S. toll processors' changes in average unit values between comparison periods**

Changes in dollars per short ton

| Item                                 | 2019-21 | 2019-20 | 2020-21 | Jan-Jun<br>2021-22 |
|--------------------------------------|---------|---------|---------|--------------------|
| Net tolling revenue                  | ***     | ***     | ***     | ***                |
| Raw materials not supplied by tollee | ***     | ***     | ***     | ***                |
| Direct labor costs                   | ***     | ***     | ***     | ***                |
| Other factory costs                  | ***     | ***     | ***     | ***                |
| COTS                                 | ***     | ***     | ***     | ***                |
| Gross profit or (loss)               | ***     | ***     | ***     | ***                |
| G&A expenses                         | ***     | ***     | ***     | ***                |
| Operating income or (loss)           | ***     | ***     | ***     | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.



**Table VI-14**  
**OCTG: U.S. toll processors' firm-by-firm tolling quantity, by period**

**Tolling quantity**

Quantity in short tons

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**  
**OCTG: U.S. toll processors' firm-by-firm tolling revenue, by period**

**Tolling revenue**

Value in 1,000 dollars

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**  
**OCTG: U.S. toll processors' firm-by-firm cost of goods tolled ("COTS"), by period**

**COTS**

Value in 1,000 dollars

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**  
**OCTG: U.S. toll processors' firm-by-firm gross profit or (loss), by period**

**Gross profit or (loss)**

Value in 1,000 dollars

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**  
**OCTG: U.S. toll processors' firm-by-firm G&A expenses, by period**

**G&A expenses**

Value in 1,000 dollars

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**  
**OCTG: U.S. toll processors' firm-by-firm operating income or (loss), by period**

**Operating income or (loss)**

Value in 1,000 dollars

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm ratio of COTS to net tolling revenue, by period**

**COTS to net tolling revenue ratio**

Ratios in percent

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm ratio of gross profit or (loss) to net tolling revenue, by period**

**Gross profit or (loss) to net tolling revenue ratio**

Ratios in percent

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm ratio of G&A expenses to net tolling revenue, by period**

**G&A expenses to net tolling revenue ratio**

Ratios in percent

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm ratio of operating income or (loss) to net tolling revenue, by period**

**Operating income or (loss) to net tolling revenue ratio**

Ratios in percent

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm unit net tolling revenue, by period**

**Unit net tolling revenue**

Unit values in dollars per short ton

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm unit raw material costs not supplied by tollee, by period**

**Unit raw material costs not supplied by tollee**

Unit values in dollars per short ton

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**  
**OCTG: U.S. toll processors' firm-by-firm unit direct labor costs, by period**

**Unit direct labor costs**

Unit values in dollars per short ton

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**  
**OCTG: U.S. toll processors' firm-by-firm unit other factory costs, by period**

**Unit other factory costs**

Unit values in dollars per short ton

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**  
**OCTG: U.S. toll processors' firm-by-firm unit COTS, by period**

**Unit COTS**

Unit values in dollars per short ton

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm unit gross profit or (loss), by period**

**Unit gross profit or (loss)**

Unit values in dollars per short ton

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm unit G&A expenses, by period**

**Unit G&A expenses**

Unit values in dollars per short ton

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VI-14 Continued**

**OCTG: U.S. toll processors' firm-by-firm unit operating income or (loss), by period**

**Unit operating income or (loss)**

Unit values in dollars per short ton

| Firm      | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------|------|------|------|--------------|--------------|
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| ***       | ***  | ***  | ***  | ***          | ***          |
| All firms | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

As seen in table VI-12, the net tolling quantity and tolling revenue of OCTG followed similar directional trends as the U.S. mills and non-toll processors' net sales quantity and value. They decreased from 2019 to 2020, increased in 2021, and were higher in the first half of 2022 than in the first half of 2021.<sup>26</sup> The average unit value of the tolling revenues increased from \$\*\*\* per short ton in 2019 to \$\*\*\* per short ton in 2020, before decreasing to \$\*\*\* per short ton in 2021. It was higher in January-June 2022 (\$\*\*\*) than in January-June 2021 (\$\*\*\*).

The total COTS includes direct labor, other factory costs, and any additional raw materials the toller uses in its processing activities other than the raw materials provided by the tollee (i.e., the unfinished OCTG).<sup>27</sup> \*\*\*, was the only toller to report any additional raw materials, and on an aggregate basis accounted for between \*\*\* percent to \*\*\* percent of the total COTS during the period for which data were collected. The tollers' direct labor costs accounted for between \*\*\* percent and \*\*\* percent of the total COTS during the reporting period, while other factory costs accounted for between \*\*\* percent and \*\*\* percent.

Toll processors' gross profit decreased from \$\*\*\* in 2019 to \$\*\*\* in 2020, but increased to \$\*\*\* in 2021. It was higher in January-June 2022 (\$\*\*\*) than in January-June 2021 (\$\*\*\*). The gross profit margin exhibited the same directional trends.

Toll processors' G&A expenses decreased irregularly from \$\*\*\* in 2019 to \$\*\*\* in 2021 but were higher in January-June 2022 (\$\*\*\*) than in January-June 2021 (\$\*\*\*). Toll processors' operating income decreased from \$\*\*\* in 2019 to \*\*\* in 2020, but improved to \*\*\* in 2021. The tollers' operating income was higher in interim 2022 (\$\*\*\*) than it was during the same period in 2021 (\*\*\*) .

Table VI-15 presents the narrative responses regarding the effects on financial performance of COVID-19 for tollers without mill-production or non-toll processing.

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<sup>26</sup> The majority of toll-processed OCTG was \*\*\*. OCTG that was processed for \*\*\* accounted for between \*\*\* percent of the total quantity of toll-processed OCTG during the period for which data were collected, and \*\*\* percent of the U.S. mills' total shipment volume of OCTG. Calculated from U.S. producers' questionnaire responses, sections II-7 and II-16.

<sup>27</sup> \*\*\*. \*\*\*.

**Table VI-15**

**OCTG: U.S. toll processors' narrative responses relating to COVID-19 pandemic effects on U.S. producers' financial performance**

| Firm | Narrative response |
|------|--------------------|
| ***  | ***                |
| ***  | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: For the narrative responses \*\*\*.



## Capital expenditures and research and development expenses

Table VI-16 presents capital expenditures, by firm, and table VI-17 presents the firms' narrative explanations of the nature, focus, and significance of their capital expenditures. \*\*\*. Total capital expenditures decreased from 2019 to 2021, but were somewhat higher in the first half of 2022 than they were in the first half of 2021. The largest declines in the annual year periods were reported by \*\*\*. Between the interim periods, \*\*\* were responsible for the majority of the increase in capital expenditures when comparing interim 2022 to interim 2021, but this was somewhat offset by \*\*\* reporting lower capital expenditures during the first half of 2022.

**Table VI-16**  
**OCTG: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars

| Firm                   | 2019    | 2020   | 2021   | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------|---------|--------|--------|--------------|--------------|
| Axis                   | ***     | ***    | ***    | ***          | ***          |
| Benteler               | ***     | ***    | ***    | ***          | ***          |
| Borusan                | ***     | ***    | ***    | ***          | ***          |
| EVRAZ                  | ***     | ***    | ***    | ***          | ***          |
| PTC Tubular            | ***     | ***    | ***    | ***          | ***          |
| RDT                    | ***     | ***    | ***    | ***          | ***          |
| SeAH Steel             | ***     | ***    | ***    | ***          | ***          |
| Tejas Tubular          | ***     | ***    | ***    | ***          | ***          |
| Tenaris USA/IPSCO      | ***     | ***    | ***    | ***          | ***          |
| Texas Steel Conversion | ***     | ***    | ***    | ***          | ***          |
| Timken Steel           | ***     | ***    | ***    | ***          | ***          |
| Tubular Services       | ***     | ***    | ***    | ***          | ***          |
| U.S. Steel             | ***     | ***    | ***    | ***          | ***          |
| Vallourec              | ***     | ***    | ***    | ***          | ***          |
| Welded Tube USA        | ***     | ***    | ***    | ***          | ***          |
| Wheatland Tube         | ***     | ***    | ***    | ***          | ***          |
| All firms              | 178,040 | 72,883 | 66,823 | 30,521       | 36,579       |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table VI-17****OCTG: Narrative descriptions of U.S. producers' capital expenditures, by firm**

| <b>Firm</b>               | <b>Narrative on capital expenditures</b> |
|---------------------------|--|
| Axis                      | ***                                      |
| Benteler                  | ***                                      |
| Borusan                   | ***                                      |
| EVRAZ                     | ***                                      |
| PTC Tubular               | ***                                      |
| RDT                       | ***                                      |
| SeAH Steel                | ***                                      |
| Tejas Tubular             | ***                                      |
| Tenaris USA/IPSCO         | ***                                      |
| Texas Steel<br>Conversion | ***                                      |
| Timken Steel              | ***                                      |
| Tubular Services          | ***                                      |
| U.S. Steel                | ***                                      |
| Vallourec                 | ***                                      |
| Welded Tube USA           | ***                                      |
| Wheatland Tube            | ***                                      |

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-18 presents R&D expenses, by firm, and table VI-19 presents the firms' narrative explanations of the nature, focus, and significance of their R&D expenses. R&D expenses were reported by six firms. \*\*\* accounted for the largest company-specific share in each period, and accounted for the majority (\*\*\*) percent) of total R&D expenses from January 1, 2019 – June 30, 2022. The industry's R&D expenses decreased from 2019 to 2021 and were lower in interim 2022 than they were in interim 2021.

**Table VI-18**  
**OCTG: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars

| Firm                   | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------|------|------|------|--------------|--------------|
| Axis                   | ***  | ***  | ***  | ***          | ***          |
| Benteler               | ***  | ***  | ***  | ***          | ***          |
| Borusan                | ***  | ***  | ***  | ***          | ***          |
| EVRAZ                  | ***  | ***  | ***  | ***          | ***          |
| PTC Tubular            | ***  | ***  | ***  | ***          | ***          |
| RDT                    | ***  | ***  | ***  | ***          | ***          |
| SeAH Steel             | ***  | ***  | ***  | ***          | ***          |
| Tejas Tubular          | ***  | ***  | ***  | ***          | ***          |
| Tenaris USA/IPSCO      | ***  | ***  | ***  | ***          | ***          |
| Texas Steel Conversion | ***  | ***  | ***  | ***          | ***          |
| Timken Steel           | ***  | ***  | ***  | ***          | ***          |
| Tubular Services       | ***  | ***  | ***  | ***          | ***          |
| U.S. Steel             | ***  | ***  | ***  | ***          | ***          |
| Vallourec              | ***  | ***  | ***  | ***          | ***          |
| Welded Tube USA        | ***  | ***  | ***  | ***          | ***          |
| Wheatland Tube         | ***  | ***  | ***  | ***          | ***          |
| All firms              | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table VI-19****OCTG: Narrative descriptions of U.S. producers' R&D expenses, by firm**

| <b>Firm</b>            | <b>Narrative on R&amp;D expenses</b> |
|------------------------|--------------------------------------|
| Axis                   | ***                                  |
| Benteler               | ***                                  |
| Borusan                | ***                                  |
| EVRAZ                  | ***                                  |
| PTC Tubular            | ***                                  |
| RDT                    | ***                                  |
| SeAH Steel             | ***                                  |
| Tejas Tubular          | ***                                  |
| Tenaris USA/IPSCO      | ***                                  |
| Texas Steel Conversion | ***                                  |
| Timken Steel           | ***                                  |
| Tubular Services       | ***                                  |
| U.S. Steel             | ***                                  |
| Vallourec              | ***                                  |
| Welded Tube USA        | ***                                  |
| Wheatland Tube         | ***                                  |

Source: Compiled from data submitted in response to Commission questionnaires.

## Assets and return on assets

Table VI-20 presents data on the U.S. producers' total assets while Table VI-21 presents their operating ROA.<sup>28</sup> Table VI-22 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in assets over time.

Total net assets decreased from 2019 to 2020 and increased in 2021. \*\*\* accounted for most of the decrease in net assets from 2019 to 2020. \*\*\*, \*\*\*. Between 2020 and 2021, \*\*\* accounted for most of the increase in net assets. \*\*\*, \*\*\*.<sup>29</sup> The industry's operating ROA worsened from negative \*\*\* percent in 2019 to negative \*\*\* percent in 2020 before improving somewhat to negative \*\*\* percent in 2021.

---

<sup>28</sup> The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

<sup>29</sup> Email from \*\*\*.

**Table VI-20**  
**OCTG: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

| <b>Firm</b>            | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|------------------------|-------------|-------------|-------------|
| Axis                   | ***         | ***         | ***         |
| Benteler               | ***         | ***         | ***         |
| Borusan                | ***         | ***         | ***         |
| EVRAZ                  | ***         | ***         | ***         |
| PTC Tubular            | ***         | ***         | ***         |
| RDT                    | ***         | ***         | ***         |
| SeAH Steel             | ***         | ***         | ***         |
| Tejas Tubular          | ***         | ***         | ***         |
| Tenaris USA/IPSCO      | ***         | ***         | ***         |
| Texas Steel Conversion | ***         | ***         | ***         |
| Timken Steel           | ***         | ***         | ***         |
| Tubular Services       | ***         | ***         | ***         |
| U.S. Steel             | ***         | ***         | ***         |
| Vallourec              | ***         | ***         | ***         |
| Welded Tube USA        | ***         | ***         | ***         |
| Wheatland Tube         | ***         | ***         | ***         |
| All firms              | ***         | ***         | ***         |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table VI-21**  
**OCTG: U.S. producers' ROA, by firm and period**

Ratio in percent

| <b>Firm</b>            | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|------------------------|-------------|-------------|-------------|
| Axis                   | ***         | ***         | ***         |
| Benteler               | ***         | ***         | ***         |
| Borusan                | ***         | ***         | ***         |
| EVRAZ                  | ***         | ***         | ***         |
| PTC Tubular            | ***         | ***         | ***         |
| RDT                    | ***         | ***         | ***         |
| SeAH Steel             | ***         | ***         | ***         |
| Tejas Tubular          | ***         | ***         | ***         |
| Tenaris USA/IPSCO      | ***         | ***         | ***         |
| Texas Steel Conversion | ***         | ***         | ***         |
| Timken Steel           | ***         | ***         | ***         |
| Tubular Services       | ***         | ***         | ***         |
| U.S. Steel             | ***         | ***         | ***         |
| Vallourec              | ***         | ***         | ***         |
| Welded Tube USA        | ***         | ***         | ***         |
| Wheatland Tube         | ***         | ***         | ***         |
| All firms              | ***         | ***         | ***         |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: \*\*\*.

**Table VI-22****OCTG: Narrative descriptions of U.S. producers' total net assets, by firm**

| <b>Firm</b>            | <b>Narrative on assets</b> |
|------------------------|----------------------------|
| Axis                   | ***                        |
| Benteler               | ***                        |
| Borusan                | ***                        |
| EVRAZ                  | ***                        |
| IPSCO                  | ***                        |
| PTC Tubular            | ***                        |
| RDT                    | ***                        |
| SeAH Steel             | ***                        |
| Splendora              | ***                        |
| Tejas Tubular          | ***                        |
| Tenaris USA            | ***                        |
| Texas Steel Conversion | ***                        |
| Timken Steel           | ***                        |
| Tubular Services       | ***                        |
| U.S. Steel             | ***                        |
| Vallourec              | ***                        |
| Welded Tube USA        | ***                        |
| Wheatland Tube         | ***                        |

Source: Compiled from data submitted in response to Commission questionnaires.



## Capital and investment

The Commission requested U.S. producers of OCTG to describe any actual or potential negative effects of imports of OCTG from Argentina, Mexico, Russia, and South Korea on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-23 presents the number of firms reporting an impact in each category and Table VI-24 provides the U.S. producers' narrative responses.

**Table VI-23**

**OCTG: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2019, by effect**

Number of firms reporting

| Effect   | Category   | Count |
|--|------------|-------|
| Cancellation, postponement, or rejection of expansion projects | Investment | 7     |
| Denial or rejection of investment proposal                     | Investment | 1     |
| Reduction in the size of capital investments                   | Investment | 3     |
| Return on specific investments negatively impacted             | Investment | 2     |
| Other negative effects on investments                          | Investment | 4     |
| Any negative effects on investment                             | Investment | 9     |
| Rejection of bank loans  | Growth     | 2     |
| Lowering of credit rating                                      | Growth     | 1     |
| Problem related to the issue of stocks or bonds                | Growth     | 0     |
| Ability to service debt  | Growth     | 2     |
| Other negative effects on growth and development               | Growth     | 4     |
| Any negative effects on growth and development                 | Growth     | 6     |
| Anticipated negative effects of imports                        | Future     | 10    |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Five companies, \*\*\*, responded that they did not experience any negative effects on investment from subject imports. \*\*\* did not provide a response, and \*\*\* indicated it did not have sufficient information to answer this question. Eight companies, \*\*\*, reported that they did not experience any negative effects on growth and development from subject imports. \*\*\* did not provide a response, and \*\*\* indicated it did not have sufficient information to answer this question. Five companies, \*\*\*, reported that they did not anticipate any future negative effects from subject imports.

**Table VI-24****OCTG: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2019**

| Item   | Firm name and narrative on impact of imports |
|--|--|
| Cancellation, postponement, or rejection of expansion projects | ***  |
| Cancellation, postponement, or rejection of expansion projects | ***  |
| Cancellation, postponement, or rejection of expansion projects | ***  |
| Cancellation, postponement, or rejection of expansion projects | ***  |
| Cancellation, postponement, or rejection of expansion projects | ***  |
| Cancellation, postponement, or rejection of expansion projects | ***  |
| Cancellation, postponement, or rejection of expansion projects | ***  |
| Denial or rejection of investment proposal                     | ***  |
| Reduction in the size of capital investments                   | ***  |
| Reduction in the size of capital investments                   | ***  |
| Reduction in the size of capital investments                   | ***  |
| Return on specific investments negatively impacted             | ***  |
| Return on specific investments negatively impacted             | ***  |
| Other negative effects on investments                          | ***  |
| Other negative effects on investments                          | ***  |
| Other negative effects on investments                          | ***  |

| Item   | Firm name and narrative on impact of imports |
|--|--|
| Other negative effects on investments            | ***  |
| Rejection of bank loans                          | ***  |
| Lowering of credit rating                        | ***  |
| Ability to service debt                          | ***  |
| Other negative effects on growth and development | ***  |
| Other negative effects on growth and development | ***  |
| Other negative effects on growth and development | ***  |
| Other negative effects on growth and development | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |
| Anticipated negative effects of imports          | ***  |

Source: Compiled from data submitted in response to Commission questionnaires.



## Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

*In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors<sup>1</sup>--*

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

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<sup>1</sup> Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) *the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,*
- (VII) *in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) *the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) *any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).<sup>2</sup>*

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

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<sup>2</sup> Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

## The industry in Argentina

The Commission issued foreign producers' or exporters' questionnaires to nine firms believed to produce and/or export OCTG from Argentina.<sup>3</sup> A usable response to the Commission's questionnaire was received from one firm: Siderca.<sup>4</sup> Siderca's exports to the United States accounted for \*\*\* U.S. imports of OCTG from Argentina in 2021, based on official Commerce import statistics.<sup>5</sup> Siderca estimates that it accounted for approximately \*\*\* percent of overall production of OCTG in Argentina during 2021. Table VII-1 presents information on the OCTG operations of the responding producer/exporter in Argentina.

**Table VII-1**  
**OCTG: Summary data for producer Siderca in Argentina, 2021**

Quantity in short tons; Share in percent

| Firm      | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|-----------|-------------------------|--|---|--|------------------------------|---|
| Siderca   | ***                     | 100.0                                  | ***                                       | 100.0  | ***                          | ***   |
| All firms | ***                     | 100.0                                  | ***                                       | 100.0  | ***                          | ***   |

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>3</sup> These firms were identified through a review of information submitted in the petition and presented in third-party sources. All identified firms maintain API certification to manufacture or process products in accordance with specification 5CT. American Petroleum Institute, Composite List, <https://mycerts.api.org/Search/CompositeSearch>, accessed June 13, 2022.

<sup>4</sup> Siderca is part of the Tenaris group of companies and is affiliated with U.S. producer Tenaris USA, U.S. importer Tenaris Global, and Mexican producer TAMSA.

<sup>5</sup> Siderca's reported exports to the United States \*\*\* U.S. imports from Argentina in 2021, based on official Commerce import statistics. This may be due to timing differences in shipping/Customs clearance and recordkeeping.

## Changes in operations

Table VII-2 presents Argentinian producer Siderca’s reported operational and organizational changes since January 1, 2019.

**Table VII-2**  
**OCTG: Reported changes in operations in Argentina by Siderca since January 1, 2019**

| Item                    | Narrative response |
|-------------------------|--------------------|
| Production curtailments | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

## Operations on OCTG

Tables VII-3 and VII-4 present information on the OCTG operations of the responding producer/exporter in Argentina. Siderca’s capacity to produce OCTG \*\*\* during the period for which data were collected. Capacity \*\*\* between 2019 and 2021 and is projected to \*\*\* during 2022 and 2023. Production decreased by \*\*\* percent during 2019-20 then increased by \*\*\* percent during 2020-21, ending \*\*\* percent lower in 2021 than in 2019. Production was \*\*\* percent higher in January-June 2022 than in January-June 2021. Siderca’s production is projected to increase \*\*\* percent during 2021-22 then further increase \*\*\* percent during 2022-23. Capacity utilization sharply decreased from \*\*\* percent in 2019 to \*\*\* percent in 2020 before increasing to \*\*\* percent in 2021 and was higher in January-June 2022 than in January-June 2021. Siderca projects that its capacity utilization will increase to \*\*\* percent in 2022 and \*\*\* percent in 2023. Regarding anticipated changes relating to the production of OCTG in the future, Siderca indicated that \*\*\*.<sup>6</sup>

Total home market shipments decreased by \*\*\* percent during 2019-21 but were \*\*\* percent higher in January-June 2022 than in January-June 2021. Export shipments to the United States increased by \*\*\* percent during 2019-21, while exports to all other markets decreased by \*\*\* percent. Exports to the United States were \*\*\* percent lower in January-June 2022 than in January-June 2021, whereas exports to all other markets were \*\*\* percent higher. Total home market shipments and exports to all other markets are projected to increase during 2021-23, while exports to the United States are projected to decrease.

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<sup>6</sup> Siderca’s foreign producer questionnaire response, II-2c.



**Table VII-3**  
**OCTG: Data on industry in Argentina, by period**

Quantity in short tons

| Item                                | 2019 | 2020 | 2021 | Jan-Jun<br>2021 | Jan-Jun<br>2022 | Projected<br>2022 | Projected<br>2023 |
|-------------------------------------|------|------|------|-----------------|-----------------|-------------------|-------------------|
| Capacity                            | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Production                          | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| End-of-period<br>inventories        | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Internal consumption                | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Commercial home<br>market shipments | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Home market<br>shipments            | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Exports to the United<br>States     | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Exports to all other<br>markets     | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Export shipments                    | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Total shipments                     | ***  | ***  | ***  | ***             | ***             | ***               | ***               |

Table continued.

**Table VII-3 Continued**  
**OCTG: Data on industry in Argentina, by period**

Ratios and shares in percent

| Item                                   | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 | Projected 2022 | Projected 2023 |
|--|-------|-------|-------|--------------|--------------|----------------|----------------|
| Capacity utilization ratio             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to production          | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to total shipments     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Internal consumption share             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Commercial home market shipments share | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Home market shipments share            | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to the United States share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to all other markets share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Export shipments share                 | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Total shipments share                  | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        | 100.0          | 100.0          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table VII-4**  
**OCTG: Production in Argentina by Siderca, by type and period**

Quantity in short tons; Shares in percent

| Production type          | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|--------------------------|----------|-------|-------|-------|--------------|--------------|
| Seamless OCTG production | Quantity | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Quantity | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Quantity | ***   | ***   | ***   | ***          | ***          |
| Seamless OCTG production | Share    | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Share    | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

## Alternative products

Table VII-5 presents Argentinian producer Siderca’s overall capacity and production of alternative products on the same equipment and machinery used to produce OCTG. Siderca reported that it produces \*\*\* on the same equipment and machinery used to produce OCTG.<sup>7</sup> \*\*\* of Siderca’s \*\*\* capacity is dedicated to the production of OCTG. Regarding the ability to switch production between OCTG and alternative products, Siderca reported that \*\*\*.<sup>8</sup>

**Table VII-5**  
**OCTG: Argentinian producer Siderca’s overall capacity and production on the same equipment as subject production, by period**

Quantity in short tons; Ratios and shares in percent

| Item                       | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|----------|-------|-------|-------|--------------|--------------|
| Overall capacity           | Quantity | ***   | ***   | ***   | ***          | ***          |
| OCTG production            | Quantity | ***   | ***   | ***   | ***          | ***          |
| Other production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total capacity utilization | Ratio    | ***   | ***   | ***   | ***          | ***          |
| OCTG production            | Share    | ***   | ***   | ***   | ***          | ***          |
| Other production           | Share    | ***   | ***   | ***   | ***          | ***          |
| Total production           | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>7</sup> Siderca’s foreign producer/exporter questionnaire response, II-3a.

<sup>8</sup> Siderca’s foreign producer/exporter questionnaire response, II-4.

## Exports

Table VII-6 presents the leading export markets for casing and tubing from Argentina.<sup>9</sup> During 2019, the United States was the largest export market for casing and tubing from Argentina, accounting for 52.2 percent of such exports by volume, followed by Saudi Arabia, accounting for 21.5 percent. During 2020, the United States was the third largest export market for casing and tubing from Argentina, accounting for 11.9 percent of such exports by volume, preceded by Saudi Arabia and the UAE, accounting for 36.9 percent and 13.8 percent, respectively.<sup>10</sup>

**Table VII-6**  
**Casing and tubing: Exports from Argentina, by period**

Quantity in short tons; Value in 1,000 dollars

| Destination market            | Measure  | 2019    | 2020    | 2021    |
|-------------------------------|----------|---------|---------|---------|
| United States                 | Quantity | 158,306 | 16,735  | 162,693 |
| Saudi Arabia                  | Quantity | 65,287  | 51,988  | ---     |
| UAE                           | Quantity | 18,525  | 19,503  | 26,702  |
| Qatar                         | Quantity | 3,692   | 8,472   | ---     |
| Romania                       | Quantity | 8,756   | 7,582   | 6,780   |
| Russia                        | Quantity | 3,655   | 7,253   | 1       |
| Indonesia                     | Quantity | 2,093   | 4,389   | 9,492   |
| Brazil                        | Quantity | 9,267   | 3,783   | 4,525   |
| Colombia                      | Quantity | 1,710   | 3,719   | 3,067   |
| All other destination markets | Quantity | 32,003  | 17,619  | 27,538  |
| All destination markets       | Quantity | 303,294 | 141,044 | 240,798 |
| United States                 | Value    | 202,479 | 19,211  | 180,442 |
| Saudi Arabia                  | Value    | 80,999  | 63,556  | ---     |
| UAE                           | Value    | 35,335  | 34,145  | 42,881  |
| Qatar                         | Value    | 6,057   | 14,972  | ---     |
| Romania                       | Value    | 10,745  | 10,199  | 8,777   |
| Russia                        | Value    | 7,542   | 14,003  | 25      |
| Indonesia                     | Value    | 2,206   | 3,642   | 6,236   |
| Brazil                        | Value    | 9,783   | 5,692   | 5,864   |
| Colombia                      | Value    | 2,487   | 5,276   | 3,485   |
| All other destination markets | Value    | 61,355  | 30,898  | 37,160  |
| All destination markets       | Value    | 418,988 | 201,594 | 284,870 |

Table continued.

<sup>9</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

<sup>10</sup> Global Trade Atlas ("GTA") data for 2021 are not yet available for Saudi Arabia, which accounted for a sizable quantity of imports of casing and tubing from Argentina in previous years.

**Table VII-6 Continued**  
**Casing and tubing: Exports from Argentina, by period**

Unit value in dollars per short ton; Shares in percent

| Destination market            | Measure           | 2019  | 2020  | 2021   |
|-------------------------------|-------------------|-------|-------|--------|
| United States                 | Unit value        | 1,279 | 1,148 | 1,109  |
| Saudi Arabia                  | Unit value        | 1,241 | 1,223 | ---    |
| UAE                           | Unit value        | 1,907 | 1,751 | 1,606  |
| Qatar                         | Unit value        | 1,641 | 1,767 | ---    |
| Romania                       | Unit value        | 1,227 | 1,345 | 1,295  |
| Russia                        | Unit value        | 2,063 | 1,931 | 20,421 |
| Indonesia                     | Unit value        | 1,054 | 830   | 657    |
| Brazil                        | Unit value        | 1,056 | 1,505 | 1,296  |
| Colombia                      | Unit value        | 1,455 | 1,418 | 1,136  |
| All other destination markets | Unit value        | 1,917 | 1,754 | 1,349  |
| All destination markets       | Unit value        | 1,381 | 1,429 | 1,183  |
| United States                 | Share of quantity | 52.2  | 11.9  | 67.6   |
| Saudi Arabia                  | Share of quantity | 21.5  | 36.9  | ---    |
| UAE                           | Share of quantity | 6.1   | 13.8  | 11.1   |
| Qatar                         | Share of quantity | 1.2   | 6.0   | ---    |
| Romania                       | Share of quantity | 2.9   | 5.4   | 2.8    |
| Russia                        | Share of quantity | 1.2   | 5.1   | 0.0    |
| Indonesia                     | Share of quantity | 0.7   | 3.1   | 3.9    |
| Brazil                        | Share of quantity | 3.1   | 2.7   | 1.9    |
| Colombia                      | Share of quantity | 0.6   | 2.6   | 1.3    |
| All other destination markets | Share of quantity | 10.6  | 12.5  | 11.4   |
| All destination markets       | Share of quantity | 100.0 | 100.0 | 100.0  |

Source: Official imports statistics of imports from Argentina (constructed export statistics for Argentina) under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed October 5, 2022.

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---”. United States is shown at the top. All remaining top export destinations are shown in descending order of 2020 data.

Note: Direct exports for Argentina as reported by INDEC – National Institute of Statistics & Census were unavailable for both 2020 and 2021. The mirror data of imports from Argentina as reported by all other responding reporters was more accurate. However, data for Saudi Arabia (the largest importer of casing and tubing from Argentina in 2020) are not yet available in the Global Trade Atlas database for 2021. Therefore, the calculated exports from Argentina data are understated for 2021.

## The industry in Mexico

The Commission issued foreign producers' or exporters' questionnaires to eight firms believed to produce and/or export OCTG from Mexico.<sup>11</sup> A usable response to the Commission's questionnaire was received from one firm: TAMSA.<sup>12</sup> TAMSA's exports to the United States accounted for \*\*\* U.S. imports of OCTG from Mexico in 2021, based on official Commerce import statistics. TAMSA estimates that it accounted for \*\*\* percent of overall production of OCTG in Mexico during 2021. Table VII-7 presents information on the OCTG operations of the responding producer/exporter in Mexico.

**Table VII-7**  
**OCTG: Summary data for producer TAMSA in Mexico, 2021**

Quantity in short tons; Shares in percent

| Firm      | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|-----------|-------------------------|--|---|--|------------------------------|---|
| TAMSA     | ***                     | 100.0                                  | ***                                       | 100.0  | ***                          | ***   |
| All firms | ***                     | 100.0                                  | ***                                       | 100.0  | ***                          | ***   |

Source: Compiled from data submitted in response to Commission questionnaires.

## Changes in operations

Table VII-8 presents Mexican producer TAMSA's reported operational and organizational changes since January 1, 2019.

<sup>11</sup> These firms were identified through a review of information submitted in the petition and presented in third-party sources. All identified firms maintain API certification to manufacture or process products in accordance with specification 5CT. American Petroleum Institute, Composite List, <https://mycerts.api.org/Search/CompositeSearch>, accessed June 13, 2022.

Four firms with operations in Mexico (\*\*\*) certified that they did not produce or export OCTG at any time since January 1, 2019.

<sup>12</sup> TAMSA is part of the Tenaris group of companies and is affiliated with U.S. producer Tenaris USA, U.S. importer Tenaris Global, and Argentinian producer Siderca.

**Table VII-8**

**OCTG: Reported changes in operations in Mexico by TAMSA since January 1, 2019**

| Item                    | Narrative response |
|-------------------------|--------------------|
| Production curtailments | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

## Operations on OCTG

Tables VII-9 and VII-10 present information on the OCTG operations of the responding producer/exporter in Mexico. TAMSA's capacity to produce OCTG \*\*\* during the period for which data were collected. Capacity increased by \*\*\* percent during 2019-21 and was \*\*\* percent lower in January-June 2022 than in January-June 2021. Production fluctuated but increased by \*\*\* percent between 2019 and 2021, decreasing by \*\*\* percent during 2019-20 then increasing by \*\*\* percent during 2020-21, and was \*\*\* percent lower in January-June 2022 than in January-June 2021. TAMSA's capacity is projected to decrease \*\*\* percent during 2021-22 then further decrease \*\*\* percent during 2022-23, while production is projected to maintain similar levels as 2021 during 2022-23. Capacity utilization fell from \*\*\* percent in 2019 to \*\*\* in 2020 then increased to \*\*\* percent in 2021, and was higher in January-June 2022 (\*\*\* percent) than in January-June 2021 (\*\*\* percent). Based on TAMSA's projections for capacity and production, its capacity utilization is anticipated to increase during 2021-23. Regarding anticipated changes relating to the production of OCTG in the future, TAMSA indicated that \*\*\*.<sup>13</sup>

Total home market shipments increased by \*\*\* percent during 2019-21 and were \*\*\* percent higher in January-June 2022 than in January-June 2021. Export shipments to the United States increased by \*\*\* percent during 2019-21, while exports to all other markets decreased by \*\*\* percent. Exports to the United States were \*\*\* percent higher in January-June 2022 than in January-June 2021, whereas exports to all other markets were \*\*\* percent lower. Total home market shipments and exports to all other markets are projected to increase during 2021-23, while exports to the United States are projected to decrease.

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<sup>13</sup> TAMSA's foreign producer questionnaire response, II-2c.

**Table VII-9**  
**OCTG: Data on industry in Mexico, by period**

Quantity in short tons

| Item                                | 2019 | 2020 | 2021 | Jan-Jun<br>2021 | Jan-Jun<br>2022 | Projected<br>2022 | Projected<br>2023 |
|-------------------------------------|------|------|------|-----------------|-----------------|-------------------|-------------------|
| Capacity                            | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Production                          | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| End-of-period<br>inventories        | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Internal consumption                | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Commercial home<br>market shipments | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Home market<br>shipments            | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Exports to the United<br>States     | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Exports to all other<br>markets     | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Export shipments                    | ***  | ***  | ***  | ***             | ***             | ***               | ***               |
| Total shipments                     | ***  | ***  | ***  | ***             | ***             | ***               | ***               |

Table continued.



**Table VII-9 Continued**  
**OCTG: Data on industry in Mexico, by period**

Ratios and shares in percent

| Item                                   | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 | Projected 2022 | Projected 2023 |
|--|-------|-------|-------|--------------|--------------|----------------|----------------|
| Capacity utilization ratio             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to production          | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to total shipments     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Internal consumption share             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Commercial home market shipments share | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Home market shipments share            | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to the United States share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to all other markets share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Export shipments share                 | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Total shipments share                  | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        | 100.0          | 100.0          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table VII-10**  
**OCTG: Production in Mexico by TAMSA, by type and period**

Quantity in short tons; Shares in percent

| Production type          | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|--------------------------|----------|-------|-------|-------|--------------|--------------|
| Seamless OCTG production | Quantity | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Quantity | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Quantity | ***   | ***   | ***   | ***          | ***          |
| Seamless OCTG production | Share    | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Share    | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

## Alternative products

Table VII-11 presents Mexican producer TAMSA's overall capacity and production of alternative products on the same equipment and machinery used to produce OCTG. TAMSA reported that it produces \*\*\* on the same equipment and machinery used to produce OCTG.<sup>14</sup> \*\*\* of TAMSA's \*\*\* capacity is dedicated to the production of OCTG. Regarding the ability to switch production between OCTG and alternative products, TAMSA reported that \*\*\*.<sup>15</sup>

**Table VII-11**

**OCTG: Mexican producer TAMSA's overall capacity and production on the same equipment as subject production, by period**

Quantity in short tons; Ratios and shares in percent

| Item                       | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|----------|-------|-------|-------|--------------|--------------|
| Overall capacity           | Quantity | ***   | ***   | ***   | ***          | ***          |
| OCTG production            | Quantity | ***   | ***   | ***   | ***          | ***          |
| Other production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total capacity utilization | Ratio    | ***   | ***   | ***   | ***          | ***          |
| OCTG production            | Share    | ***   | ***   | ***   | ***          | ***          |
| Other production           | Share    | ***   | ***   | ***   | ***          | ***          |
| Total production           | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>14</sup> TAMSA's foreign producer/exporter questionnaire response, II-3a.

<sup>15</sup> TAMSA's foreign producer/exporter questionnaire response, II-4.

## Exports

Table VII-12 presents the leading export markets for casing and tubing from Mexico.<sup>16</sup> During 2020, the United States was the largest export market for casing and tubing from Mexico, accounting for 48.4 percent of such exports by volume, followed by Canada and Australia, accounting for 10.3 percent and 6.4 percent, respectively.<sup>17</sup>

**Table VII-12**  
**Casing and tubing: Exports from Mexico, by period**

Quantity in short tons; Value in 1,000 dollars

| Destination market            | Measure  | 2019    | 2020    | 2021    |
|-------------------------------|----------|---------|---------|---------|
| United States                 | Quantity | 210,858 | 164,897 | 344,454 |
| Canada                        | Quantity | 48,097  | 35,180  | 65,216  |
| Australia                     | Quantity | 6,423   | 21,911  | 3,293   |
| United Kingdom                | Quantity | 10,094  | 19,580  | 4,341   |
| Qatar                         | Quantity | 12,137  | 15,243  | 608     |
| Colombia                      | Quantity | 18,122  | 12,524  | 23,750  |
| India                         | Quantity | 15,741  | 8,953   | 443     |
| Kuwait                        | Quantity | 11,221  | 8,544   | ---     |
| Norway                        | Quantity | 3,384   | 7,486   | 7,491   |
| All other destination markets | Quantity | 83,866  | 46,466  | 41,072  |
| All destination markets       | Quantity | 419,943 | 340,785 | 490,668 |
| United States                 | Value    | 296,325 | 212,135 | 465,626 |
| Canada                        | Value    | 83,573  | 60,570  | 80,050  |
| Australia                     | Value    | 12,422  | 15,452  | 4,857   |
| United Kingdom                | Value    | 21,986  | 35,040  | 9,028   |
| Qatar                         | Value    | 20,961  | 24,010  | 1,164   |
| Colombia                      | Value    | 30,526  | 16,937  | 25,496  |
| India                         | Value    | 25,229  | 13,066  | 685     |
| Kuwait                        | Value    | 13,420  | 10,894  | ---     |
| Norway                        | Value    | 7,035   | 17,556  | 15,161  |
| All other destination markets | Value    | 150,579 | 85,803  | 69,587  |
| All destination markets       | Value    | 662,055 | 491,462 | 671,655 |

Table continued.

<sup>16</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

<sup>17</sup> GTA data for 2021 are not yet available for several countries with sizeable imports of casing and tubing from Mexico.

**Table VII-12 Continued**  
**Casing and tubing: Exports from Mexico, by period**

Unit value in dollars per dollars per short ton; Share in percent

| <b>Destination market</b>     | <b>Measure</b>    | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|-------------------------------|-------------------|-------------|-------------|-------------|
| United States                 | Unit value        | 1,405       | 1,286       | 1,352       |
| Canada                        | Unit value        | 1,738       | 1,722       | 1,227       |
| Australia                     | Unit value        | 1,934       | 705         | 1,475       |
| United Kingdom                | Unit value        | 2,178       | 1,790       | 2,080       |
| Qatar                         | Unit value        | 1,727       | 1,575       | 1,915       |
| Colombia                      | Unit value        | 1,684       | 1,352       | 1,074       |
| India                         | Unit value        | 1,603       | 1,459       | 1,547       |
| Kuwait                        | Unit value        | 1,196       | 1,275       | ---         |
| Norway                        | Unit value        | 2,079       | 2,345       | 2,024       |
| All other destination markets | Unit value        | 1,795       | 1,847       | 1,694       |
| All destination markets       | Unit value        | 1,577       | 1,442       | 1,369       |
| United States                 | Share of quantity | 50.2        | 48.4        | 70.2        |
| Canada                        | Share of quantity | 11.5        | 10.3        | 13.3        |
| Australia                     | Share of quantity | 1.5         | 6.4         | 0.7         |
| United Kingdom                | Share of quantity | 2.4         | 5.7         | 0.9         |
| Qatar                         | Share of quantity | 2.9         | 4.5         | 0.1         |
| Colombia                      | Share of quantity | 4.3         | 3.7         | 4.8         |
| India                         | Share of quantity | 3.7         | 2.6         | 0.1         |
| Kuwait                        | Share of quantity | 2.7         | 2.5         | ---         |
| Norway                        | Share of quantity | 0.8         | 2.2         | 1.5         |
| All other destination markets | Share of quantity | 20.0        | 13.6        | 8.4         |
| All destination markets       | Share of quantity | 100.0       | 100.0       | 100.0       |

Source: Official imports statistics of imports from Mexico (constructed export statistics for Mexico) under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed October 5, 2022.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data.

Note: Direct exports data from Mexico as reported by INEGI were incomplete for all periods (only reported exports to the United States). The mirror data of imports from Mexico as reported by all other responding countries was more accurate. However, several countries with sizeable imports of casing and tubing from Mexico in 2019 and 2020 did not yet have data available in the Global Trade Atlas database for 2021. Therefore, the calculated exports from Mexico are understated for 2021.

## The industry in Russia

The Commission issued foreign producers' or exporters' questionnaires to nine firms believed to produce and/or export OCTG from Russia.<sup>18 19</sup> A usable response to the Commission's questionnaire was received from one firm: TMK Group. TMK Group's exports to the United States accounted for approximately \*\*\* percent of U.S. imports of OCTG from Russia in 2021, based on official Commerce import statistics. TMK Group estimates that it accounted for approximately \*\*\* percent of overall production of OCTG in Russia during 2021. Table VII-13 presents information on the OCTG operations of the responding producer/exporter in Russia.

**Table VII-13**  
**OCTG: Summary data for producer TMK Group in Russia, 2021**

Quantity in short tons; Share in percent

| Firm      | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|-----------|-------------------------|--|---|--|------------------------------|---|
| TMK Group | ***                     | 100.0                                  | ***                                       | 100.0  | ***                          | ***   |
| All firms | ***                     | 100.0                                  | ***                                       | 100.0  | ***                          | ***   |

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>18</sup> These firms were identified through a review of information submitted in the petition and presented in third-party sources.

One firm with operations in Russia (\*\*\*) certified that it did not produce or export OCTG at any time since January 1, 2019.

<sup>19</sup> Russian producers are currently not permitted to apply the API monogram to their products. \*\*. Respondent TMK's posthearing brief, p. 3; and email from \*\*, September 9, 2022.

In addition, Presidential Proclamation 10371, issued April 21, 2022, prohibited Russian-affiliated vessels from entering into United States ports. "A Proclamation on the Declaration of National Emergency and Invocation of Emergency Authority Relating to the Regulation of the Anchorage and Movement of Russian-Affiliated Vessels to United States Ports," <https://www.whitehouse.gov/briefing-room/presidential-actions/2022/04/21/a-proclamation-on-the-declaration-of-national-emergency-and-invocation-of-emergency-authority-relating-to-the-regulation-of-the-anchorage-and-movement-of-russian-affiliated-vessels-to-united-states-po/>, accessed October 13, 2022.

## Changes in operations

Table VII-14 presents the Russian producer's reported operational and organizational changes since January 1, 2019.

**Table VII-14**

**OCTG: Reported changes in operations in Russia by TMK Group since January 1, 2019**

| Item                     | Narrative response |
|--------------------------|--------------------|
| Acquisitions             | ***                |
| Consolidations           | ***                |
| Revised labor agreements | ***                |
| Other                    | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

## Operations on OCTG

Tables VII-15 and VII-16 present information on the OCTG operations of the responding producer/exporter in Russia. TMK Group's capacity to produce OCTG \*\*\* during the period for which data were collected. Capacity increased by \*\*\* percent during 2019-21 and was slightly higher in January-June 2022 than in January-June 2021. Production decreased by \*\*\* percent during 2019-20 then increased by \*\*\* percent during 2020-21, increasing by \*\*\* percent between 2019 and 2021. Production was \*\*\* percent higher in January-June 2022 compared to January-June 2021. TMK Group's capacity is projected to increase \*\*\* percent during 2021-23 and its production is projected to increase \*\*\* during 2021-22 then decrease \*\*\* percent during 2022-23. Capacity utilization decreased from \*\*\* percent in 2019 to \*\*\* percent in 2020 then increased to \*\*\* percent in 2021. TMK Group's capacity utilization was higher in January-June 2022 (\*\*\* percent) than in January-June 2021 (\*\*\* percent). Based on TMK Group's projections for capacity and production, its capacity utilization is anticipated to decrease during 2021-23.

Total home market shipments increased by \*\*\* percent during 2019-21 and were \*\*\* percent higher in January-June 2022 than in January-June 2021. Export shipments to the United States decreased by \*\*\* percent during 2019-21, whereas exports to all other markets increased by \*\*\* percent. TMK Group reported \*\*\* exports to the United States in January-June 2022, compared to \*\*\* short tons in January-June 2021. Export shipments to all other

markets were \*\*\* percent lower in January-June 2022 than in January-June 2021. Exports to the United States are projected to \*\*\* during 2022 and 2023. TMK Group explained that \*\*\* due to “the current prohibitively high level of customs duties applicable to OCTG” from Russia and, as of March 2022, the loss of the ability for Russian producers to certify their products under an API license.<sup>20</sup> Exports to all other markets are projected to be higher in 2023 than in 2021, whereas home market shipments are projected to be lower in 2023 than in 2021.

**Table VII-15**  
**OCTG: Data on industry in Russia, by period**

Quantity in short tons

| Item                             | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 | Projected 2022 | Projected 2023 |
|----------------------------------|------|------|------|--------------|--------------|----------------|----------------|
| Capacity                         | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Production                       | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| End-of-period inventories        | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Internal consumption             | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Commercial home market shipments | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Home market shipments            | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Exports to the United States     | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Exports to all other markets     | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Export shipments                 | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Total shipments                  | ***  | ***  | ***  | ***          | ***          | ***            | ***            |

Table continued.

<sup>20</sup> Email from \*\*\*, September 21, 2022.

**Table VII-15 Continued**  
**OCTG: Data on industry in Russia, by period**

Ratios and shares in percent

| Item                                   | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 | Projected 2022 | Projected 2023 |
|--|-------|-------|-------|--------------|--------------|----------------|----------------|
| Capacity utilization ratio             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to production          | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to total shipments     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Internal consumption share             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Commercial home market shipments share | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Home market shipments share            | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to the United States share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to all other markets share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Export shipments share                 | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Total shipments share                  | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        | 100.0          | 100.0          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table VII-16**  
**OCTG: Production in Russia by TMK Group, by type and period**

Quantity in short tons; Shares in percent

| Production type          | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|--------------------------|----------|-------|-------|-------|--------------|--------------|
| Seamless OCTG production | Quantity | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Quantity | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Quantity | ***   | ***   | ***   | ***          | ***          |
| Seamless OCTG production | Share    | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Share    | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.



## Alternative products

Table VII-17 presents Russian producer TMK Group’s overall capacity and production of alternative products on the same equipment and machinery used to produce OCTG. TMK Group reported that it produces \*\*\* on the same equipment and machinery used to produce OCTG.<sup>21</sup> \*\*\* of TMK Group’s \*\*\* capacity is dedicated to the production of OCTG.

**Table VII-17**

**OCTG: Russian producer TMK Group’s overall capacity and production on the same equipment as subject production, by period**

Quantity in short tons; Ratios and shares in percent

| Item                       | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|----------|-------|-------|-------|--------------|--------------|
| Overall capacity           | Quantity | ***   | ***   | ***   | ***          | ***          |
| OCTG production            | Quantity | ***   | ***   | ***   | ***          | ***          |
| Other production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total capacity utilization | Ratio    | ***   | ***   | ***   | ***          | ***          |
| OCTG production            | Share    | ***   | ***   | ***   | ***          | ***          |
| Other production           | Share    | ***   | ***   | ***   | ***          | ***          |
| Total production           | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

## Exports

Table VII-18 presents the leading export markets for casing and tubing from Russia.<sup>22</sup> During 2021, the United States was the largest export market for casing and tubing from Russia, accounting for 41.2 percent of such exports by volume, followed by Kazakhstan and Uzbekistan, accounting for 17.0 percent and 13.0 percent, respectively.

<sup>21</sup> TMK Group’s foreign producer/exporter questionnaire response, II-3a.

<sup>22</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

**Table VII-18**  
**Casing and tubing: Exports from Russia, by period**

Quantity in short tons; Value in 1,000 dollars

| <b>Destination market</b>     | <b>Measure</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|-------------------------------|----------------|-------------|-------------|-------------|
| United States                 | Quantity       | 190,364     | 49,444      | 152,995     |
| Kazakhstan                    | Quantity       | 113,268     | 57,964      | 63,127      |
| Uzbekistan                    | Quantity       | 30,870      | 34,817      | 48,288      |
| Turkmenistan                  | Quantity       | 6,902       | 21,647      | 22,808      |
| Belarus                       | Quantity       | 17,952      | 23,997      | 18,763      |
| Kuwait                        | Quantity       | 4,143       | ---         | 14,659      |
| Egypt                         | Quantity       | 23,437      | 11,933      | 11,992      |
| Azerbaijan                    | Quantity       | 19,844      | 6,037       | 9,196       |
| Colombia                      | Quantity       | 1,719       | 329         | 8,780       |
| All other destination markets | Quantity       | 31,746      | 26,241      | 20,900      |
| All destination markets       | Quantity       | 440,245     | 232,409     | 371,509     |
| United States                 | Value          | 153,995     | 31,116      | 113,100     |
| Kazakhstan                    | Value          | 103,358     | 46,756      | 57,216      |
| Uzbekistan                    | Value          | 39,307      | 34,750      | 51,328      |
| Turkmenistan                  | Value          | 9,300       | 23,333      | 22,336      |
| Belarus                       | Value          | 20,143      | 21,510      | 21,779      |
| Kuwait                        | Value          | 2,951       | ---         | 8,199       |
| Egypt                         | Value          | 18,169      | 10,023      | 8,955       |
| Azerbaijan                    | Value          | 21,738      | 6,556       | 10,628      |
| Colombia                      | Value          | 1,437       | 267         | 7,193       |
| All other destination markets | Value          | 31,985      | 21,864      | 19,932      |
| All destination markets       | Value          | 402,383     | 196,174     | 320,665     |

Table continued.

**Table VII-18 Continued**  
**Casing and tubing: Exports from Russia, by period**

Unit value in dollars per short ton; Shares in percent

| <b>Destination market</b>     | <b>Measure</b>    | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|-------------------------------|-------------------|-------------|-------------|-------------|
| United States                 | Unit value        | 809         | 629         | 739         |
| Kazakhstan                    | Unit value        | 913         | 807         | 906         |
| Uzbekistan                    | Unit value        | 1,273       | 998         | 1,063       |
| Turkmenistan                  | Unit value        | 1,347       | 1,078       | 979         |
| Belarus                       | Unit value        | 1,122       | 896         | 1,161       |
| Kuwait                        | Unit value        | 712         | ---         | 559         |
| Egypt                         | Unit value        | 775         | 840         | 747         |
| Azerbaijan                    | Unit value        | 1,095       | 1,086       | 1,156       |
| Colombia                      | Unit value        | 836         | 809         | 819         |
| All other destination markets | Unit value        | 1,008       | 833         | 954         |
| All destination markets       | Unit value        | 914         | 844         | 863         |
| United States                 | Share of quantity | 43.2        | 21.3        | 41.2        |
| Kazakhstan                    | Share of quantity | 25.7        | 24.9        | 17.0        |
| Uzbekistan                    | Share of quantity | 7.0         | 15.0        | 13.0        |
| Turkmenistan                  | Share of quantity | 1.6         | 9.3         | 6.1         |
| Belarus                       | Share of quantity | 4.1         | 10.3        | 5.1         |
| Kuwait                        | Share of quantity | 0.9         | ---         | 3.9         |
| Egypt                         | Share of quantity | 5.3         | 5.1         | 3.2         |
| Azerbaijan                    | Share of quantity | 4.5         | 2.6         | 2.5         |
| Colombia                      | Share of quantity | 0.4         | 0.1         | 2.4         |
| All other destination markets | Share of quantity | 7.2         | 11.3        | 5.6         |
| All destination markets       | Share of quantity | 100.0       | 100.0       | 100.0       |

Source: Official exports statistics under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by Customs Committee of Russia in the Global Trade Atlas database, accessed August 9, 2022.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

## The industry in South Korea

The Commission issued foreign producers' or exporters' questionnaires to nine firms believed to produce and/or export OCTG from South Korea.<sup>23</sup> Usable responses to the Commission's questionnaire were received from three firms: Hyundai Steel, Kumkang Kind, and SeAH Steel. On September 29, 2022, Commerce published a notice in the Federal Register of its affirmative final determination of countervailable subsidies for producers and exporters of OCTG from South Korea. However, Commerce calculated a de minimis countervailable subsidy rate with respect to Hyundai Steel.<sup>24</sup> Accordingly, data for Hyundai Steel are not included in this section.

Responding subject producers' exports to the United States accounted for approximately \*\*\* percent of subject imports of OCTG from South Korea in 2021, based on official Commerce import statistics, with adjustments \*\*\*. Additionally, responding subject producers estimate that they accounted for approximately \*\*\* percent of overall production of OCTG in South Korea during 2021.<sup>25</sup> Table VII-19 presents information on the OCTG operations of the responding producer/exporter in South Korea.

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<sup>23</sup> These firms were identified through a review of information submitted in the petition and presented in third-party sources. All identified firms maintain API certification to manufacture or process products in accordance with specification 5CT. American Petroleum Institute, Composite List, <https://mycerts.api.org/Search/CompositeSearch>, accessed June 13, 2022.

<sup>24</sup> 87 FR 59056, September 29, 2022.

<sup>25</sup> This estimate is based on total production of OCTG in South Korea, including production by Hyundai Steel which, as a result of Commerce's de minimis finding, is nonsubject. Accordingly, the share of subject production of OCTG in South Korea during 2021 accounted for by responding South Korean producers is likely understated. Netting out Hyundai Steel's estimated share of total production as provided in its foreign producer questionnaire response, Commission staff estimate that responding firms accounted for approximately \*\*\* percent of subject OCTG production in South Korea during 2021.

**Table VII-19**  
**OCTG: Summary data for subject producers in South Korea, 2021**

Quantity in short tons; Shares in percent

| <b>Firm</b>  | <b>Production (short tons)</b> | <b>Share of reported production (percent)</b> | <b>Exports to the United States (short tons)</b> | <b>Share of reported exports to the United States (percent)</b> | <b>Total shipments (short tons)</b> | <b>Share of firm's total shipments exported to the United States (percent)</b> |
|--------------|--------------------------------|---|--|---|-------------------------------------|--|
| Kumkang Kind | ***                            | ***   | ***  | ***   | ***                                 | ***  |
| SeAH Steel   | ***                            | ***   | ***  | ***   | ***                                 | ***  |
| All firms    | ***                            | 100.0   | ***  | 100.0   | ***                                 | ***  |

Source: Compiled from data submitted in response to Commission questionnaires.

## Changes in operations

Table VII-20 presents the South Korean producers' reported operational and organizational changes since January 1, 2019.

**Table VII-20**  
**OCTG: Reported changes in operations in South Korea by subject producers since January 1, 2019, by firm**

| <b>Item</b>             | <b>Firm name and accompanying narrative response</b> |
|-------------------------|--|
| Production curtailments | ***  |

Source: Compiled from data submitted in response to Commission questionnaires.

## Operations on OCTG

Tables VII-21 and VII-22 present information on the OCTG operations of the responding South Korean producers/exporters. South Korean producers' capacity to produce OCTG \*\*\* during the period for which data were collected. Capacity \*\*\* during 2019-21 and \*\*\* during January-June 2021 and January-June 2022. Moreover, capacity is projected to \*\*\* during 2022 and 2023. Production decreased by \*\*\* percent during 2019-20 but then increased by \*\*\* percent during 2020-21, increasing overall by \*\*\* percent between 2019 and 2021. Production was \*\*\* percent lower in January-June 2022 than in January-June 2021 and is projected to decrease by \*\*\* percent during 2021-22 and by \*\*\* percent during 2022-23. Capacity utilization decreased from \*\*\* percent in 2019 to \*\*\* percent in 2020 but then increased to \*\*\* percent in 2021. Capacity utilization was lower in January-June 2022 (\*\*\*)

percent) than in January-June 2021 (\*\*\*) percent) and is projected to be \*\*\* percent in 2022 and \*\*\* percent in 2023.

Exports to the United States accounted for \*\*\* South Korean producers' total shipments of OCTG during the period for which data were collected. Exports to the United States decreased by \*\*\* percent during 2019-20 but then increased by \*\*\* percent during 2020-21, increasing overall by \*\*\* percent between 2019 and 2021. These exports were \*\*\* percent lower in January-June 2022 than in January-June 2021 and are projected to decrease and remain below 2021 levels during 2022 and 2023.

**Table VII-21**  
**OCTG: Data on industry in South Korea, by period**

Quantity in short tons

| Item                             | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 | Projected 2022 | Projected 2023 |
|----------------------------------|------|------|------|--------------|--------------|----------------|----------------|
| Capacity                         | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Production                       | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| End-of-period inventories        | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Internal consumption             | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Commercial home market shipments | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Home market shipments            | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Exports to the United States     | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Exports to all other markets     | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Export shipments                 | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Total shipments                  | ***  | ***  | ***  | ***          | ***          | ***            | ***            |

Table continued.

**Table VII-21 Continued**  
**OCTG: Data on industry in South Korea, by period**

Ratios and shares in percent

| Item                                   | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 | Projected 2022 | Projected 2023 |
|--|-------|-------|-------|--------------|--------------|----------------|----------------|
| Capacity utilization ratio             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to production          | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to total shipments     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Internal consumption share             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Commercial home market shipments share | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Home market shipments share            | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to the United States share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to all other markets share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Export shipments share                 | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Total shipments share                  | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        | 100.0          | 100.0          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Note: Commission staff adjusted capacity for \*\*\* to reflect product mix.

**Table VII-22**  
**OCTG: Production in South Korea by Kumkang Kind and SeAH Steel, by type and period**

Quantity in short tons; Shares in percent

| Production type          | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|--------------------------|----------|-------|-------|-------|--------------|--------------|
| Seamless OCTG production | Quantity | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Quantity | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Quantity | ***   | ***   | ***   | ***          | ***          |
| Seamless OCTG production | Share    | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Share    | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.



## Alternative products

Table VII-23 presents the South Korean producers' overall capacity and production of alternative products on the same equipment and machinery used to produce OCTG. South Korean producers reported that they produce \*\*\* on the same equipment and machinery used to produce OCTG.<sup>26</sup> \*\*\* percent of South Korean producers' \*\*\* capacity is dedicated to the production of other products.

**Table VII-23**

**OCTG: South Korean producers Kumkang Kind's and SeAH Steel's overall capacity and production on the same equipment as subject production, by period**

Quantity in short tons; Ratios and shares in percent

| Item                       | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|----------|-------|-------|-------|--------------|--------------|
| Overall capacity           | Quantity | ***   | ***   | ***   | ***          | ***          |
| OCTG production            | Quantity | ***   | ***   | ***   | ***          | ***          |
| Other production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total production           | Quantity | ***   | ***   | ***   | ***          | ***          |
| Total capacity utilization | Ratio    | ***   | ***   | ***   | ***          | ***          |
| OCTG production            | Share    | ***   | ***   | ***   | ***          | ***          |
| Other production           | Share    | ***   | ***   | ***   | ***          | ***          |
| Total production           | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

## Exports

Table VII-24 presents the leading export markets for casing and tubing from South Korea.<sup>27</sup> During 2021, the United States was the largest export market for casing and tubing from South Korea, accounting for virtually all (99.6 percent) of such exports by volume.

<sup>26</sup> Kumkang Kind's foreign producer/exporter questionnaire response, II-3a and SeAH Steel's foreign producer/exporter questionnaire response, II-4.

<sup>27</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

**Table VII-24**  
**Casing and tubing: Exports from South Korea, by period**

Quantity in short tons; Value in 1,000 dollars

| <b>Destination market</b>     | <b>Measure</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|-------------------------------|----------------|-------------|-------------|-------------|
| United States                 | Quantity       | 380,379     | 325,769     | 548,675     |
| UAE                           | Quantity       | ---         | ---         | 1,447       |
| China                         | Quantity       | 53          | 22          | 213         |
| Australia                     | Quantity       | 17          | ---         | 113         |
| Thailand                      | Quantity       | 7           | 23          | 80          |
| Malaysia                      | Quantity       | 2           | 6           | 43          |
| Dominican Republic            | Quantity       | ---         | ---         | 35          |
| Vietnam                       | Quantity       | 159         | 50          | 18          |
| Papua New Guinea              | Quantity       | 14          | ---         | 13          |
| All other destination markets | Quantity       | 29,361      | 34,313      | 39          |
| All destination markets       | Quantity       | 409,991     | 360,184     | 550,676     |
| United States                 | Value          | 312,601     | 215,565     | 630,098     |
| UAE                           | Value          | ---         | ---         | 2,023       |
| China                         | Value          | 20          | 588         | 5,372       |
| Australia                     | Value          | 38          | ---         | 132         |
| Thailand                      | Value          | 13          | 315         | 695         |
| Malaysia                      | Value          | 51          | 101         | 127         |
| Dominican Republic            | Value          | ---         | ---         | 177         |
| Vietnam                       | Value          | 132         | 308         | 210         |
| Papua New Guinea              | Value          | 29          | ---         | 63          |
| All other destination markets | Value          | 26,836      | 31,928      | 724         |
| All destination markets       | Value          | 339,720     | 248,804     | 639,620     |

Table continued.

**Table VII-24 Continued**  
**Casing and tubing: Exports from South Korea, by period**

Unit value in dollars per short ton; Shares in percent

| Destination market            | Measure           | 2019   | 2020   | 2021   |
|-------------------------------|-------------------|--------|--------|--------|
| United States                 | Unit value        | 822    | 662    | 1,148  |
| UAE                           | Unit value        | ---    | ---    | 1,398  |
| China                         | Unit value        | 372    | 26,655 | 25,269 |
| Australia                     | Unit value        | 2,178  | ---    | 1,170  |
| Thailand                      | Unit value        | 2,011  | 13,676 | 8,734  |
| Malaysia                      | Unit value        | 26,154 | 15,697 | 2,933  |
| Dominican Republic            | Unit value        | ---    | ---    | 5,061  |
| Vietnam                       | Unit value        | 830    | 6,213  | 11,498 |
| Papua New Guinea              | Unit value        | 2,158  | ---    | 4,807  |
| All other destination markets | Unit value        | 914    | 930    | 18,352 |
| All destination markets       | Unit value        | 829    | 691    | 1,162  |
| United States                 | Share of quantity | 92.8   | 90.4   | 99.6   |
| UAE                           | Share of quantity | ---    | ---    | 0.3    |
| China                         | Share of quantity | 0.0    | 0.0    | 0.0    |
| Australia                     | Share of quantity | 0.0    | ---    | 0.0    |
| Thailand                      | Share of quantity | 0.0    | 0.0    | 0.0    |
| Malaysia                      | Share of quantity | 0.0    | 0.0    | 0.0    |
| Dominican Republic            | Share of quantity | ---    | ---    | 0.0    |
| Vietnam                       | Share of quantity | 0.0    | 0.0    | 0.0    |
| Papua New Guinea              | Share of quantity | 0.0    | ---    | 0.0    |
| All other destination markets | Share of quantity | 7.2    | 9.5    | 0.0    |
| All destination markets       | Share of quantity | 100.0  | 100.0  | 100.0  |

Source: Official exports statistics under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by South Korea Trade Statistics Promotion Institute (KTSPI) in the Global Trade Atlas database, accessed August 9, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

## Subject countries combined

Tables VII-25 and VII-26 present summary data on OCTG operations of the reporting subject producers in the subject countries.

**Table VII-25**  
**OCTG: Data on industry in aggregated subject countries, by period**

Quantity in short tons

| Item                             | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 | Projected 2022 | Projected 2023 |
|----------------------------------|------|------|------|--------------|--------------|----------------|----------------|
| Capacity                         | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Production                       | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| End-of-period inventories        | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Internal consumption             | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Commercial home market shipments | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Home market shipments            | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Exports to the United States     | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Exports to all other markets     | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Export shipments                 | ***  | ***  | ***  | ***          | ***          | ***            | ***            |
| Total shipments                  | ***  | ***  | ***  | ***          | ***          | ***            | ***            |

Table continued.

**Table VII-25 Continued**  
**OCTG: Data on industry in aggregated subject countries, by period**

Ratios and shares in percent

| Item                                   | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 | Projected 2022 | Projected 2023 |
|--|-------|-------|-------|--------------|--------------|----------------|----------------|
| Capacity utilization ratio             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to production          | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Inventory ratio to total shipments     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Internal consumption share             | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Commercial home market shipments share | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Home market shipments share            | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to the United States share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Exports to all other markets share     | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Export shipments share                 | ***   | ***   | ***   | ***          | ***          | ***            | ***            |
| Total shipments share                  | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        | 100.0          | 100.0          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table VII-26**  
**OCTG: Production in aggregated subject countries, by type and period**

Quantity in short tons; Shares in percent

| Production type          | Measure  | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|--------------------------|----------|-------|-------|-------|--------------|--------------|
| Seamless OCTG production | Quantity | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Quantity | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Quantity | ***   | ***   | ***   | ***          | ***          |
| Seamless OCTG production | Share    | ***   | ***   | ***   | ***          | ***          |
| Welded OCTG production   | Share    | ***   | ***   | ***   | ***          | ***          |
| All OCTG production      | Share    | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires.

## **U.S. inventories of imported merchandise**

Table VII-27 presents data on U.S. importers' reported inventories of OCTG. Inventories of subject imports decreased by \*\*\* percent during 2019-20 then increased by \*\*\* percent during 2020-21, decreasing overall by \*\*\* percent between 2019 and 2021. Inventories of subject imports were \*\*\* percent lower in January-June 2022 than in January-June 2021. Inventories of nonsubject imports decreased by \*\*\* percent during 2019-21 but were \*\*\* percent higher in January-June 2022 than in January-June 2021. Inventories of imports from all sources decreased by \*\*\* percent between 2019 and 2021 and were \*\*\* percent lower in January-June 2022 than in January-June 2021.

The ratio of U.S. importers' inventories to imports of OCTG from subject sources increased from \*\*\* percent in 2019 to \*\*\* percent in 2020 then decreased to \*\*\* percent in 2021 and was lower in January-June 2022 (\*\*\* percent) than in January-June 2021 (\*\*\* percent).

**Table VII-27**

**OCTG: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in short tons; Ratios in percent

| Measure                             | Source               | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|----------------------|------|------|------|--------------|--------------|
| Inventories quantity                | Argentina            | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | Argentina            | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | Argentina            | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | Argentina            | ***  | ***  | ***  | ***          | ***          |
| Inventories quantity                | Mexico               | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | Mexico               | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | Mexico               | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | Mexico               | ***  | ***  | ***  | ***          | ***          |
| Inventories quantity                | Russia               | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | Russia               | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | Russia               | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | Russia               | ***  | ***  | ***  | ***          | ***          |
| Inventories quantity                | South Korea, subject | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | South Korea, subject | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | South Korea, subject | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | South Korea, subject | ***  | ***  | ***  | ***          | ***          |
| Inventories quantity                | Subject              | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | Subject              | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | Subject              | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | Subject              | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table VII-27 Continued**

**OCTG: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in short tons; Ratios in percent

| Measure                             | Source                  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------------|------|------|------|--------------|--------------|
| Inventories quantity                | South Korea, nonsubject | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | South Korea, nonsubject | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | South Korea, nonsubject | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | South Korea, nonsubject | ***  | ***  | ***  | ***          | ***          |
| Inventories quantity                | All other sources       | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | All other sources       | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | All other sources       | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | All other sources       | ***  | ***  | ***  | ***          | ***          |
| Inventories quantity                | Nonsubject              | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | Nonsubject              | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | Nonsubject              | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | Nonsubject              | ***  | ***  | ***  | ***          | ***          |
| Inventories quantity                | All                     | ***  | ***  | ***  | ***          | ***          |
| Ratio to imports                    | All                     | ***  | ***  | ***  | ***          | ***          |
| Ratio to U.S. shipments of imports  | All                     | ***  | ***  | ***  | ***          | ***          |
| Ratio to total shipments of imports | All                     | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.



## U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of OCTG after June 30, 2022 (table VII-28). Twenty of 27 responding firms indicated that they had arranged such imports, five of which reported arranged imports from subject sources.

**Table VII-28**  
**OCTG: U.S. importers' arranged imports, by source and period**

Quantity in short tons

| Source                  | Jul-Sep 2022 | Oct-Dec 2022 | Jan-Mar 2023 | Apr-Jun 2023 | Total |
|-------------------------|--------------|--------------|--------------|--------------|-------|
| Argentina               | ***          | ***          | ***          | ***          | ***   |
| Mexico                  | ***          | ***          | ***          | ***          | ***   |
| Russia                  | ***          | ***          | ***          | ***          | ***   |
| South Korea, subject    | ***          | ***          | ***          | ***          | ***   |
| Subject sources         | ***          | ***          | ***          | ***          | ***   |
| South Korea, nonsubject | ***          | ***          | ***          | ***          | ***   |
| All other sources       | ***          | ***          | ***          | ***          | ***   |
| Nonsubject sources      | ***          | ***          | ***          | ***          | ***   |
| All import sources      | 327,296      | 270,699      | ***          | ***          | ***   |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Third-country trade actions

### Canada

In March 2015, Canada issued antidumping duty orders on certain OCTG originating in or exported from South Korea (as well as India, Indonesia, Taiwan, the Philippines, Thailand, Turkey, Ukraine, and Vietnam), with an antidumping duty margin of 37.4 percent.<sup>28</sup> These orders were renewed in August 2020.<sup>29</sup>

In December 2021, the Canada Border Services Agency made a final determination of dumping of OCTG originating in or exported from Mexico, with antidumping duty margins of 43.3 percent for Tubos de Acero de Mexico S.A. and 164.7 percent for all other Mexican

<sup>28</sup> Canada Border Services Agency, "Statement of Reasons," March 18, 2015, <https://www.cbsa-asfc.gc.ca/sima-lmsi/i-e/ad1404/ad1404-i14-fd-eng.html>. The following South Korean companies were subject to duties determined based on specific normal values: Hyundai Hysco, PanMeridian, and SeAH Steel.

<sup>29</sup> Canada Border Services Agency, "Statement of Reasons," August 7, 2020, <https://www.cbsa-asfc.gc.ca/sima-lmsi/er-rre/octg22020/octg22020-de-eng.pdf>.

exporters.<sup>30</sup> However, in January 2022, the Canadian International Trade Tribunal found that the dumping had not caused injury and is not threatening to cause injury to the domestic industry and the antidumping duties were terminated.<sup>31</sup>

## European Union

In July 2018, the EU imposed provisional safeguard measures on imports of certain steel products, including OCTG.<sup>32</sup> In January 2019, the EU imposed definitive safeguard measures on imports of certain steel products and later extended those safeguard measures for three years until June 30, 2024. The EU safeguard measures are in the form of tariff-rate quotas, and imports of certain steel products exceeding the quotas are subject to an additional duty of 25 percent. The EU safeguard measures divide steel products into 28 product categories, of which 3 categories contain OCTG: Other Seamless Tubes, Large Welded Tubes, and Other Welded Pipes. These 3 categories also contain steel products that are not OCTG.<sup>33</sup>

Russia and South Korea are subject to EU safeguard measures for all three categories of steel products that contain OCTG. Argentina is not subject to the EU safeguard measures on certain steel products because it is included in a list of developing country members of the World Trade Organization (“WTO”) which are excluded from the safeguard measures. Mexico is also included in the list of developing country members of the WTO, but because imports into the EU of Other Seamless Tubes from Mexico exceed 3 percent of total imports into the EU of that product, Mexico is subject to tariff-rate quotas for Other Seamless Tubes. Mexico is exempt from safeguard measures on Large Welded Tubes and Other Welded Pipes.<sup>34</sup> Tables 29-

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<sup>30</sup> Canada Border Services Agency, “Notice of final determination,” December 22, 2021, <https://www.cbsa-asfc.gc.ca/sima-lmsi/i-e/octg32021/octg32021-nf-eng.html>.

<sup>31</sup> Canadian International Trade Tribunal, “Finding and Reasons,” January 26, 2022, <https://decisions.citt-tcce.gc.ca/citt-tcce/a/en/519628/1/document.do>.

<sup>32</sup> European Commission, “Commission implementing regulation (EU) 2018/1013 of 17 July 2018 imposing provisional safeguard measures with regard to imports of certain steel products,” July 18, 2018, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R1013&from=EN>.

<sup>33</sup> European Commission, “Commission implementing regulation (EU) 2019/159 of 31 January 2019 imposing definitive safeguard measures with regard to imports of certain steel products,” February 1, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN>.

European Commission, “Commission implementing regulation (EU) 2021/1029 of 24 June 2021 amending Commission Implementing Regulation (EU) 2019/159 to prolong the safeguard measure on imports of certain steel products,” June 25, 2021, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1029&from=EN>.

<sup>34</sup> European Commission, “Commission implementing regulation (EU) 2019/159 of 31 January 2019 imposing definitive safeguard measures with regard to imports of certain steel products,” pp. 28, 36, February 1, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN>.

31 show the EU safeguard tariff-rate quota levels for subject countries and product groups that contain OCTG.

**Table VII-29**  
**EU safeguard tariff-rate quotas: Other seamless tubes**

Quantity in metric tons

| <b>Period</b>                      | <b>Mexico, Russia, South Korea, and all other countries subject to the safeguard measures other than Belarus, China, Japan, Ukraine, and the United States</b> | <b>Mexico, Russia, South Korea, and all other countries subject to the safeguard measures other than Belarus, China, Ukraine, the United Kingdom, and the United States</b> |
|------------------------------------|--|---|
| February 2, 2019, to June 30, 2019 | 55,345.57  | Not applicable  |
| July 1, 2019, to June 30, 2020     | 142,356.97   | Not applicable  |
| July 1, 2020, to June 30, 2021     | 149,474.82   | Not applicable  |
| July 1, 2021, to June 30, 2022     | Not applicable   | 148,130.30  |
| July 1, 2022, to June 30, 2023     | Not applicable   | 152,574.20  |
| July 1, 2023, to June 30, 2024     | Not applicable   | 157,151.40  |

Source: European Commission, "Commission implementing regulation (EU) 2019/159 of 31 January 2019 imposing definitive safeguard measures with regard to imports of certain steel products," p. 44, February 1, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN>.

European Commission, "Commission implementing regulation (EU) 2021/1029 of 24 June 2021 amending Commission Implementing Regulation (EU) 2019/159 to prolong the safeguard measure on imports of certain steel products," p. 36, June 25, 2021, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1029&from=EN>.

Note: Belarus, China, Ukraine, and the United States are subject to country-specific tariff-rate quotas for Other Seamless Tubes from February 2, 2019, to June 30, 2024. Japan was subject to country-specific tariff-rate quotas from February 2, 2019, to June 30, 2021. The United Kingdom is subject to country-specific tariff-rate quotas from July 1, 2021, to June 30, 2024.

**Table VII-30**  
**EU safeguard tariff-rate quotas: Large welded tubes**

Quantity in metric tons

| <b>Period</b>                      | <b>Russia</b> | <b>South Korea and all other countries subject to the safeguard measures other than China, Russia, and Turkey</b> | <b>South Korea</b> |
|------------------------------------|---------------|---|--------------------|
| February 2, 2019, to June 30, 2019 | 140,602.32    | 34,011.86   | Not applicable     |
| July 1, 2019, to June 30, 2020     | 361,649.91    | 87,483.52   | Not applicable     |
| July 1, 2020, to June 30, 2021     | 379,732.41    | 91,857.70   | Not applicable     |
| July 1, 2021, to June 30, 2022     | 26,224.89     | Not applicable  | 10,394.57          |
| July 1, 2022, to June 30, 2023     | 27,011.66     | Not applicable  | 10,706.41          |
| July 1, 2023, to June 30, 2024     | 27,822.00     | Not applicable  | 11,027.61          |

Source: European Commission, "Commission implementing regulation (EU) 2019/159 of 31 January 2019 imposing definitive safeguard measures with regard to imports of certain steel products," p. 44, February 1, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN>.

European Commission, "Commission implementing regulation (EU) 2021/1029 of 24 June 2021 amending Commission Implementing Regulation (EU) 2019/159 to prolong the safeguard measure on imports of certain steel products," p. 36, June 25, 2021, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1029&from=EN>.

Note: China, Russia, and Turkey are subject to country-specific tariff-rate quotas for Large Welded Tubes from February 2, 2019, to June 30, 2024. South Korea and the United States are subject to country-specific tariff-rate quotas from July 1, 2021, to June 30, 2024.

Note: Beginning July 1, 2021, the category of Large Welded Tubes was divided into two separate groups: 25.A and 25.B. Group 25.B included OCTG. This subdivision of Larger Welded Tubes is responsible for the tariff-rate quotas shown in the table decreasing beginning July 1, 2021.

**Table VII-31**  
**EU safeguard tariff-rate quotas: Other welded pipes**

Quantity in metric tons

| <b>Period</b>                      | <b>Russia, South Korea, and all other countries subject to the safeguard measures other than China, India, Switzerland, Taiwan, Turkey, and the United Arab Emirates</b> | <b>Russia</b>  | <b>South Korea and all other countries subject to the safeguard measures other than China, Russia, Switzerland, Taiwan, Turkey, and the United Kingdom</b> |
|------------------------------------|--|----------------|--|
| February 2, 2019, to June 30, 2019 | 36,898.57  | Not applicable | Not applicable   |
| July 1, 2019, to June 30, 2020     | 94,908.57  | Not applicable | Not applicable   |
| July 1, 2020, to June 30, 2021     | 99,653.99  | Not applicable | Not applicable   |
| July 1, 2021, to June 30, 2022     | Not applicable   | 26,746.04      | 87,091.38  |
| July 1, 2022, to June 30, 2023     | Not applicable   | 27,548.41      | 89,704.11  |
| July 1, 2023, to June 30, 2024     | Not applicable   | 27,548.41      | 92,395.24  |

Source: European Commission, “Commission implementing regulation (EU) 2019/159 of 31 January 2019 imposing definitive safeguard measures with regard to imports of certain steel products,” p. 45, February 1, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN>.

European Commission, “Commission implementing regulation (EU) 2021/1029 of 24 June 2021 amending Commission Implementing Regulation (EU) 2019/159 to prolong the safeguard measure on imports of certain steel products,” p. 37, June 25, 2021, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1029&from=EN>.

Note: China, Switzerland, Taiwan, and Turkey are subject to country-specific tariff-rate quotas for Other Welded Pipes from February 2, 2019, to June 30, 2024. India and the United Arab Emirates were subject to country-specific tariff-rate quotas from February 2, 2019, to June 30, 2021. Russia and the United Kingdom were subject to country-specific tariff-rate quotas from July 1, 2021, to June 30, 2024.

## Thailand

In July 2017, Thailand issued antidumping duty orders on certain iron and steel pipe and tube (including certain OCTG) from South Korea, with antidumping duty margins of 3.49 percent to 53.88 percent.<sup>35</sup>

<sup>35</sup> World Trade Organization, *Semi-Annual Report under Article 16.4 of the Agreement: Thailand*, G/ADP/N/308/THA, February 2, 2018, p. 4,

<https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N308THA.pdf&Open=True>.

The subject product of Thailand’s antidumping duty order is defined as: “Certain iron steel pipe and tube  
*(continued...)*”

## Information on nonsubject countries

### Austria

In 2021, the United States and Canada were the top destination markets for casing and tubing from Austria, accounting for 53.4 percent and 32.1 percent, respectively, of Austria's casing and tubing exports under HS subheadings 7304.29, 7305.20, and 7306.29, by quantity (table VII-32).<sup>36</sup> According to GTA, Austria was the sixth largest global exporter of casing and tubing, by quantity, in 2021 (table VII-37).

**Table VII-32**  
**Casing and tubing: Exports from Austria, by period**

Quantity in short tons; Value in 1,000 dollars

| Destination market            | Measure  | 2019    | 2020    | 2021    |
|-------------------------------|----------|---------|---------|---------|
| United States                 | Quantity | 100,702 | 62,599  | 119,214 |
| Canada                        | Quantity | 48,384  | 29,956  | 71,712  |
| Ukraine                       | Quantity | 9,709   | 4,402   | 6,120   |
| Egypt                         | Quantity | 11,395  | 7,934   | 4,752   |
| Saudi Arabia                  | Quantity | 2,604   | 5,784   | 3,104   |
| Qatar                         | Quantity | 2,672   | 1,761   | 2,536   |
| Iraq                          | Quantity | 8,955   | 514     | 2,528   |
| Germany                       | Quantity | 2,927   | 1,478   | 2,105   |
| Libya                         | Quantity | 1,342   | 4,124   | 1,886   |
| All other destination markets | Quantity | 58,285  | 17,363  | 9,126   |
| All destination markets       | Quantity | 246,976 | 135,915 | 223,084 |
| United States                 | Value    | 112,779 | 58,726  | 152,346 |
| Canada                        | Value    | 63,556  | 36,736  | 111,358 |
| Ukraine                       | Value    | 13,744  | 6,431   | 9,525   |
| Egypt                         | Value    | 16,960  | 10,342  | 6,654   |
| Saudi Arabia                  | Value    | 3,797   | 7,855   | 4,850   |
| Qatar                         | Value    | 3,676   | 1,917   | 3,047   |
| Iraq                          | Value    | 15,131  | 835     | 3,093   |
| Germany                       | Value    | 4,308   | 2,471   | 3,149   |
| Libya                         | Value    | 1,778   | 5,289   | 2,135   |
| All other destination markets | Value    | 76,850  | 23,835  | 19,034  |
| All destination markets       | Value    | 312,580 | 154,437 | 315,190 |

Table continued.

HS: 7305.11, 7305.12, 7305.19, 7305.31, 7305.39, 7305.90, 7306.19, 7306.29, 7306.30, 7306.50, 7306.61, 7306.69, 7306.90."

<sup>36</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

**Table VII-32 Continued**  
**Casing and tubing: Exports from Austria, by period**

Unit values in dollars per short ton; Shares in percent

| Destination market            | Measure           | 2019  | 2020  | 2021  |
|-------------------------------|-------------------|-------|-------|-------|
| United States                 | Unit value        | 1,120 | 938   | 1,278 |
| Canada                        | Unit value        | 1,314 | 1,226 | 1,553 |
| Ukraine                       | Unit value        | 1,416 | 1,461 | 1,556 |
| Egypt                         | Unit value        | 1,488 | 1,304 | 1,400 |
| Saudi Arabia                  | Unit value        | 1,458 | 1,358 | 1,562 |
| Qatar                         | Unit value        | 1,376 | 1,089 | 1,202 |
| Iraq                          | Unit value        | 1,690 | 1,624 | 1,224 |
| Germany                       | Unit value        | 1,472 | 1,672 | 1,496 |
| Libya                         | Unit value        | 1,324 | 1,283 | 1,132 |
| All other destination markets | Unit value        | 1,319 | 1,373 | 2,086 |
| All destination markets       | Unit value        | 1,266 | 1,136 | 1,413 |
| United States                 | Share of quantity | 40.8  | 46.1  | 53.4  |
| Canada                        | Share of quantity | 19.6  | 22.0  | 32.1  |
| Ukraine                       | Share of quantity | 3.9   | 3.2   | 2.7   |
| Egypt                         | Share of quantity | 4.6   | 5.8   | 2.1   |
| Saudi Arabia                  | Share of quantity | 1.1   | 4.3   | 1.4   |
| Qatar                         | Share of quantity | 1.1   | 1.3   | 1.1   |
| Iraq                          | Share of quantity | 3.6   | 0.4   | 1.1   |
| Germany                       | Share of quantity | 1.2   | 1.1   | 0.9   |
| Libya                         | Share of quantity | 0.5   | 3.0   | 0.8   |
| All other destination markets | Share of quantity | 23.6  | 12.8  | 4.1   |
| All destination markets       | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official exports statistics under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by Eurostat in the Global Trade Atlas database, accessed August 9, 2022.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

### Canada

In 2021, the United States was the top destination market for casing and tubing from Canada, accounting for 99.3 percent of Canada's casing and tubing exports under HS subheadings 7304.29, 7305.20, and 7306.29, by quantity (table VII-33).<sup>37</sup> According to GTA, Canada was the tenth largest global exporter of casing and tubing, by quantity, in 2021 (table VII-37).

<sup>37</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

**Table VII-33**  
**Casing and tubing: Exports from Canada, by period**

Quantity in short tons; Value in 1,000 dollars

| <b>Destination market</b>     | <b>Measure</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|-------------------------------|----------------|-------------|-------------|-------------|
| United States                 | Quantity       | 85,963      | 57,255      | 100,523     |
| Australia                     | Quantity       | 803         | 693         | 274         |
| Iraq                          | Quantity       | 2           | ---         | 112         |
| India                         | Quantity       | 155         | 37          | 98          |
| China                         | Quantity       | 2           | 63          | 89          |
| Bahamas                       | Quantity       | ---         | ---         | 33          |
| Spain                         | Quantity       | ---         | ---         | 25          |
| Argentina                     | Quantity       | 13          | ---         | 14          |
| Saudi Arabia                  | Quantity       | 1           | ---         | 10          |
| All other destination markets | Quantity       | 1,038       | 5,183       | 50          |
| All destination markets       | Quantity       | 87,978      | 63,231      | 101,228     |
| United States                 | Value          | 109,478     | 63,459      | 147,368     |
| Australia                     | Value          | 5,242       | 5,933       | 2,797       |
| Iraq                          | Value          | 4           | ---         | 334         |
| India                         | Value          | 647         | 602         | 492         |
| China                         | Value          | 20          | 1,102       | 1,255       |
| Bahamas                       | Value          | ---         | ---         | 250         |
| Spain                         | Value          | ---         | ---         | 17          |
| Argentina                     | Value          | 119         | ---         | 60          |
| Saudi Arabia                  | Value          | 13          | ---         | 23          |
| All other destination markets | Value          | 5,370       | 16,107      | 646         |
| All destination markets       | Value          | 120,894     | 87,203      | 153,243     |

Table continued.



**Table VII-33 Continued**  
**Casing and tubing: Exports from Canada, by period**

Unit values in dollars per short ton; Shares in percent

| Destination market            | Measure           | 2019   | 2020   | 2021   |
|-------------------------------|-------------------|--------|--------|--------|
| United States                 | Unit value        | 1,274  | 1,108  | 1,466  |
| Australia                     | Unit value        | 6,530  | 8,565  | 10,200 |
| Iraq                          | Unit value        | 2,071  | ---    | 2,996  |
| India                         | Unit value        | 4,172  | 16,130 | 5,005  |
| China                         | Unit value        | 9,116  | 17,413 | 14,037 |
| Bahamas                       | Unit value        | ---    | ---    | 7,677  |
| Spain                         | Unit value        | ---    | ---    | 669    |
| Argentina                     | Unit value        | 9,196  | ---    | 4,368  |
| Saudi Arabia                  | Unit value        | 11,545 | ---    | 2,346  |
| All other destination markets | Unit value        | 5,172  | 3,107  | 12,917 |
| All destination markets       | Unit value        | 1,374  | 1,379  | 1,514  |
| United States                 | Share of quantity | 97.7   | 90.5   | 99.3   |
| Australia                     | Share of quantity | 0.9    | 1.1    | 0.3    |
| Iraq                          | Share of quantity | 0.0    | ---    | 0.1    |
| India                         | Share of quantity | 0.2    | 0.1    | 0.1    |
| China                         | Share of quantity | 0.0    | 0.1    | 0.1    |
| Bahamas                       | Share of quantity | ---    | ---    | 0.0    |
| Spain                         | Share of quantity | ---    | ---    | 0.0    |
| Argentina                     | Share of quantity | 0.0    | ---    | 0.0    |
| Saudi Arabia                  | Share of quantity | 0.0    | ---    | 0.0    |
| All other destination markets | Share of quantity | 1.2    | 8.2    | 0.0    |
| All destination markets       | Share of quantity | 100.0  | 100.0  | 100.0  |

Source: Official exports statistics under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by Statistics Canada in the Global Trade Atlas database, accessed August 9, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

## China

In 2021, Oman, Thailand, and Algeria were the top destination markets for casing and tubing from China, accounting for 18.1 percent, 12.5 percent, and 8.4 percent, respectively, of China's casing and tubing exports under HS subheadings 7304.29, 7305.20, and 7306.29, by quantity (table VII-34).<sup>38</sup> According to GTA, China was the largest global exporter of casing and tubing, by quantity, in 2021 (table VII-37).

<sup>38</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

**Table VII-34**  
**Casing and tubing: Exports from China, by period**

Quantity in short tons; value in 1,000 dollars

| <b>Destination market</b>     | <b>Measure</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|-------------------------------|----------------|-------------|-------------|-------------|
| United States                 | Quantity       | 9,139       | 4,297       | 8,515       |
| Oman                          | Quantity       | 223,720     | 122,326     | 174,057     |
| Thailand                      | Quantity       | 45,195      | 51,281      | 120,145     |
| Algeria                       | Quantity       | 134,600     | 19,028      | 81,241      |
| Australia                     | Quantity       | 61,530      | 62,082      | 72,290      |
| Turkey                        | Quantity       | 50,001      | 35,519      | 45,271      |
| Bahrain                       | Quantity       | 24,756      | 13,929      | 40,300      |
| Singapore                     | Quantity       | 38,428      | 20,302      | 39,976      |
| Canada                        | Quantity       | 25,201      | 8,814       | 37,667      |
| All other destination markets | Quantity       | 830,087     | 570,073     | 344,694     |
| All destination markets       | Quantity       | 1,442,657   | 907,652     | 964,156     |
| United States                 | Value          | 19,185      | 7,241       | 10,551      |
| Oman                          | Value          | 203,830     | 95,270      | 154,003     |
| Thailand                      | Value          | 48,256      | 51,482      | 106,318     |
| Algeria                       | Value          | 171,321     | 32,744      | 106,923     |
| Australia                     | Value          | 56,817      | 47,053      | 74,201      |
| Turkey                        | Value          | 50,705      | 28,480      | 42,127      |
| Bahrain                       | Value          | 23,975      | 13,003      | 41,305      |
| Singapore                     | Value          | 34,978      | 19,501      | 35,985      |
| Canada                        | Value          | 31,275      | 9,885       | 45,319      |
| All other destination markets | Value          | 874,417     | 566,742     | 404,105     |
| All destination markets       | Value          | 1,514,760   | 871,400     | 1,020,837   |

Table continued.

**Table VII-34 Continued**  
**Casing and tubing: Exports from China, by period**

Unit values in dollars per short ton; shares in percent

| Destination market            | Measure           | 2019  | 2020  | 2021  |
|-------------------------------|-------------------|-------|-------|-------|
| United States                 | Unit value        | 2,099 | 1,685 | 1,239 |
| Oman                          | Unit value        | 911   | 779   | 885   |
| Thailand                      | Unit value        | 1,068 | 1,004 | 885   |
| Algeria                       | Unit value        | 1,273 | 1,721 | 1,316 |
| Australia                     | Unit value        | 923   | 758   | 1,026 |
| Turkey                        | Unit value        | 1,014 | 802   | 931   |
| Bahrain                       | Unit value        | 968   | 934   | 1,025 |
| Singapore                     | Unit value        | 910   | 961   | 900   |
| Canada                        | Unit value        | 1,241 | 1,122 | 1,203 |
| All other destination markets | Unit value        | 1,053 | 994   | 1,172 |
| All destination markets       | Unit value        | 1,050 | 960   | 1,059 |
| United States                 | Share of quantity | 0.6   | 0.5   | 0.9   |
| Oman                          | Share of quantity | 15.5  | 13.5  | 18.1  |
| Thailand                      | Share of quantity | 3.1   | 5.6   | 12.5  |
| Algeria                       | Share of quantity | 9.3   | 2.1   | 8.4   |
| Australia                     | Share of quantity | 4.3   | 6.8   | 7.5   |
| Turkey                        | Share of quantity | 3.5   | 3.9   | 4.7   |
| Bahrain                       | Share of quantity | 1.7   | 1.5   | 4.2   |
| Singapore                     | Share of quantity | 2.7   | 2.2   | 4.1   |
| Canada                        | Share of quantity | 1.7   | 1.0   | 3.9   |
| All other destination markets | Share of quantity | 57.5  | 62.8  | 35.8  |
| All destination markets       | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official exports statistics under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by China Customs in the Global Trade Atlas database, accessed August 9, 2022.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

## Japan

In 2020, Kuwait, Norway, and Oman were the top destination markets for casing and tubing from Japan, accounting for 30.1 percent, 25.1 percent, and 10.6 percent, respectively, of Japan's casing and tubing exports under HS subheadings 7304.29, 7305.20, and 7306.29, by quantity (table VII-35).<sup>39</sup> According to GTA, Japan was the fifth largest global exporter of casing and tubing, by quantity, in 2021 (table VII-37).

<sup>39</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

**Table VII-35**  
**Casing and tubing: Exports from Japan, by period**

Quantity in short tons; Value in 1,000 dollars

| <b>Destination market</b>     | <b>Measure</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> |
|-------------------------------|----------------|-------------|-------------|-------------|
| United States                 | Quantity       | 41,380      | 14,372      | 9,436       |
| Kuwait                        | Quantity       | 76,513      | 87,343      | 73,569      |
| Norway                        | Quantity       | 69,873      | 69,031      | 61,158      |
| Oman                          | Quantity       | 35,624      | 21,650      | 25,875      |
| Iraq                          | Quantity       | 53,105      | 32,439      | 24,978      |
| Azerbaijan                    | Quantity       | 8,039       | 10,567      | 8,296       |
| Singapore                     | Quantity       | 16,263      | 7,520       | 6,887       |
| Vietnam                       | Quantity       | 5,395       | 2,839       | 5,425       |
| Malaysia                      | Quantity       | 24,063      | 13,434      | 4,787       |
| All other destination markets | Quantity       | 153,585     | 61,850      | 23,650      |
| All destination markets       | Quantity       | 483,839     | 321,044     | 244,062     |
| United States                 | Value          | 58,197      | 20,250      | 14,970      |
| Kuwait                        | Value          | 96,703      | 105,394     | 92,219      |
| Norway                        | Value          | 103,152     | 105,325     | 91,017      |
| Oman                          | Value          | 59,538      | 36,079      | 41,705      |
| Iraq                          | Value          | 75,866      | 46,895      | 34,288      |
| Azerbaijan                    | Value          | 15,267      | 20,255      | 15,901      |
| Singapore                     | Value          | 18,762      | 9,828       | 10,772      |
| Vietnam                       | Value          | 7,136       | 2,920       | 9,248       |
| Malaysia                      | Value          | 27,980      | 20,736      | 7,004       |
| All other destination markets | Value          | 203,109     | 101,822     | 43,017      |
| All destination markets       | Value          | 665,710     | 469,505     | 360,141     |

Table continued.

**Table VII-35 Continued**  
**Casing and tubing: Exports from Japan, by period**

Unit values in dollars per short ton; Shares in percent

| Destination market            | Measure           | 2019  | 2020  | 2021  |
|-------------------------------|-------------------|-------|-------|-------|
| United States                 | Unit value        | 1,406 | 1,409 | 1,587 |
| Kuwait                        | Unit value        | 1,264 | 1,207 | 1,253 |
| Norway                        | Unit value        | 1,476 | 1,526 | 1,488 |
| Oman                          | Unit value        | 1,671 | 1,666 | 1,612 |
| Iraq                          | Unit value        | 1,429 | 1,446 | 1,373 |
| Azerbaijan                    | Unit value        | 1,899 | 1,917 | 1,917 |
| Singapore                     | Unit value        | 1,154 | 1,307 | 1,564 |
| Vietnam                       | Unit value        | 1,323 | 1,029 | 1,705 |
| Malaysia                      | Unit value        | 1,163 | 1,544 | 1,463 |
| All other destination markets | Unit value        | 1,322 | 1,646 | 1,819 |
| All destination markets       | Unit value        | 1,376 | 1,462 | 1,476 |
| United States                 | Share of quantity | 8.6   | 4.5   | 3.9   |
| Kuwait                        | Share of quantity | 15.8  | 27.2  | 30.1  |
| Norway                        | Share of quantity | 14.4  | 21.5  | 25.1  |
| Oman                          | Share of quantity | 7.4   | 6.7   | 10.6  |
| Iraq                          | Share of quantity | 11.0  | 10.1  | 10.2  |
| Azerbaijan                    | Share of quantity | 1.7   | 3.3   | 3.4   |
| Singapore                     | Share of quantity | 3.4   | 2.3   | 2.8   |
| Vietnam                       | Share of quantity | 1.1   | 0.9   | 2.2   |
| Malaysia                      | Share of quantity | 5.0   | 4.2   | 2.0   |
| All other destination markets | Share of quantity | 31.7  | 19.3  | 9.7   |
| All destination markets       | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official exports statistics under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by Japan Ministry of Finance in the Global Trade Atlas database, accessed August 9, 2022.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

## Taiwan

In 2020, the United States was the top destination market for casing and tubing from Taiwan, accounting for nearly 100.0 percent of Taiwan's casing and tubing exports under HS subheadings 7304.29, 7305.20, and 7306.29, by quantity (table VII-36).<sup>40</sup> According to GTA, Taiwan was the fourteenth largest global exporter of casing and tubing, by quantity, in 2021.<sup>41</sup>

<sup>40</sup> HS subheadings 7304.29, 7305.20, and 7306.29 do not include coupling stock.

<sup>41</sup> Global Trade Atlas database, accessed August 9, 2022.

**Table VII-36**  
**Casing and tubing: Exports from Taiwan, by period**

Quantity in short tons; Value in 1,000 dollars

| Destination market            | Measure  | 2019    | 2020   | 2021   |
|-------------------------------|----------|---------|--------|--------|
| United States                 | Quantity | 200,295 | 84,679 | 61,388 |
| Egypt                         | Quantity | ---     | ---    | 7      |
| Canada                        | Quantity | 5,573   | 1,242  | 7      |
| All other destination markets | Quantity | 106     | 468    | ---    |
| All destination markets       | Quantity | 205,974 | 86,390 | 61,401 |
| United States                 | Value    | 144,749 | 43,576 | 56,452 |
| Egypt                         | Value    | ---     | ---    | 11     |
| Canada                        | Value    | 3,952   | 913    | 60     |
| All other destination markets | Value    | 134     | 196    | 5      |
| All destination markets       | Value    | 148,835 | 44,685 | 56,528 |

Table continued.

**Table VII-36 Continued**  
**Casing and tubing: Exports from Taiwan, by period**

Unit values in dollars per short ton; Shares in percent

| Destination market            | Measure           | 2019  | 2020  | 2021  |
|-------------------------------|-------------------|-------|-------|-------|
| United States                 | Unit value        | 723   | 515   | 920   |
| Egypt                         | Unit value        | ---   | ---   | 1,662 |
| Canada                        | Unit value        | 709   | 735   | 9,042 |
| All other destination markets | Unit value        | 1,264 | 419   | ---   |
| All destination markets       | Unit value        | 723   | 517   | 921   |
| United States                 | Share of quantity | 97.2  | 98.0  | 100.0 |
| Egypt                         | Share of quantity | ---   | ---   | 0.0   |
| Canada                        | Share of quantity | 2.7   | 1.4   | 0.0   |
| All other destination markets | Share of quantity | 0.1   | 0.5   | ---   |
| All destination markets       | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official exports statistics under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by Taiwan Directorate General of Customs in the Global Trade Atlas database, accessed August 9, 2022.

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---”. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

### Global exports

Table VII-37 presents the largest global export sources of casing and tubing. China, South Korea, and Mexico were the largest exporters in 2021 and accounted for 21.9 percent, 12.5 percent, and 11.1 percent of total global exports by quantity, respectively. Russia and Argentina were also among the top ten exporters of casing and tubing in 2021. Russia was the

fourth largest exporter, representing 8.4 percent of total global exports in 2021, and Argentina was the seventh largest exporter, representing 5.5 percent of total global exports in 2021.

**Table VII-37**  
**Casing and tubing: Global exports by exporter and period**

Quantity in short tons; value in 1,000 dollars

| Exporting country       | Measure  | 2019      | 2020      | 2021      |
|-------------------------|----------|-----------|-----------|-----------|
| United States           | Quantity | 204,171   | 129,161   | 135,602   |
| Argentina               | Quantity | 303,294   | 141,044   | 240,798   |
| Mexico                  | Quantity | 419,943   | 340,785   | 490,668   |
| Russia                  | Quantity | 440,245   | 232,409   | 371,509   |
| South Korea             | Quantity | 409,991   | 360,184   | 550,676   |
| Subject exporters       | Quantity | 1,573,473 | 1,074,422 | 1,653,651 |
| China                   | Quantity | 1,442,657 | 907,652   | 964,156   |
| Japan                   | Quantity | 483,839   | 321,044   | 244,062   |
| Austria                 | Quantity | 246,976   | 135,915   | 223,084   |
| Brazil                  | Quantity | 457,760   | 248,665   | 196,471   |
| Ukraine                 | Quantity | 161,249   | 61,899    | 174,685   |
| Canada                  | Quantity | 87,978    | 63,231    | 101,228   |
| Italy                   | Quantity | 153,427   | 122,930   | 97,711    |
| All other exporters     | Quantity | 1,317,581 | 720,539   | 617,924   |
| All reporting exporters | Quantity | 6,129,111 | 3,785,459 | 4,408,574 |
| United States           | Value    | 370,845   | 255,463   | 266,126   |
| Argentina               | Value    | 418,988   | 201,594   | 284,870   |
| Mexico                  | Value    | 662,055   | 491,462   | 671,655   |
| Russia                  | Value    | 402,383   | 196,174   | 320,665   |
| South Korea             | Value    | 339,720   | 248,804   | 639,620   |
| Subject exporters       | Value    | 1,823,147 | 1,138,035 | 1,916,810 |
| China                   | Value    | 1,514,760 | 871,400   | 1,020,837 |
| Japan                   | Value    | 665,710   | 469,505   | 360,141   |
| Austria                 | Value    | 312,580   | 154,437   | 315,190   |
| Brazil                  | Value    | 524,396   | 301,078   | 224,976   |
| Ukraine                 | Value    | 143,315   | 55,749    | 166,042   |
| Canada                  | Value    | 120,894   | 87,203    | 153,243   |
| Italy                   | Value    | 245,530   | 218,632   | 159,951   |
| All other exporters     | Value    | 1,849,460 | 1,118,972 | 910,466   |
| All reporting exporters | Value    | 7,570,635 | 4,670,473 | 5,493,781 |

Table continued.

**Table VII-37 Continued**  
**Casing and tubing: Global exports by exporter and period**

Unit values in dollars per short ton; shares in percent

| Exporting country       | Measure           | 2019  | 2020  | 2021  |
|-------------------------|-------------------|-------|-------|-------|
| United States           | Unit value        | 1,816 | 1,978 | 1,963 |
| Argentina               | Unit value        | 1,381 | 1,429 | 1,183 |
| Mexico                  | Unit value        | 1,577 | 1,442 | 1,369 |
| Russia                  | Unit value        | 914   | 844   | 863   |
| South Korea             | Unit value        | 829   | 691   | 1,162 |
| Subject exporters       | Unit value        | 1,159 | 1,059 | 1,159 |
| China                   | Unit value        | 1,050 | 960   | 1,059 |
| Japan                   | Unit value        | 1,376 | 1,462 | 1,476 |
| Austria                 | Unit value        | 1,266 | 1,136 | 1,413 |
| Brazil                  | Unit value        | 1,146 | 1,211 | 1,145 |
| Ukraine                 | Unit value        | 889   | 901   | 951   |
| Canada                  | Unit value        | 1,374 | 1,379 | 1,514 |
| Italy                   | Unit value        | 1,600 | 1,779 | 1,637 |
| All other exporters     | Unit value        | 1,404 | 1,553 | 1,473 |
| All reporting exporters | Unit value        | 1,235 | 1,234 | 1,246 |
| United States           | Share of quantity | 3.3   | 3.4   | 3.1   |
| Argentina               | Share of quantity | 4.9   | 3.7   | 5.5   |
| Mexico                  | Share of quantity | 6.9   | 9.0   | 11.1  |
| Russia                  | Share of quantity | 7.2   | 6.1   | 8.4   |
| South Korea             | Share of quantity | 6.7   | 9.5   | 12.5  |
| Subject exporters       | Share of quantity | 25.7  | 28.4  | 37.5  |
| China                   | Share of quantity | 23.5  | 24.0  | 21.9  |
| Japan                   | Share of quantity | 7.9   | 8.5   | 5.5   |
| Austria                 | Share of quantity | 4.0   | 3.6   | 5.1   |
| Brazil                  | Share of quantity | 7.5   | 6.6   | 4.5   |
| Ukraine                 | Share of quantity | 2.6   | 1.6   | 4.0   |
| Canada                  | Share of quantity | 1.4   | 1.7   | 2.3   |
| Italy                   | Share of quantity | 2.5   | 3.2   | 2.2   |
| All other exporters     | Share of quantity | 21.5  | 19.0  | 14.0  |
| All reporting exporters | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official exports statistics under HS subheadings 7304.29, 7305.20, and 7306.29 accessed August 9, 2022, and official global imports statistics from Argentina and Mexico under HS subheadings 7304.29, 7305.20, and 7306.29 as reported by various national statistical authorities in the Global Trade Atlas database, accessed October 5, 2022.

Note: United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2021 data.



## Consumption

Data on global OCTG consumption are generally not available. However, because OCTG is used in oil and gas wells, the demand for OCTG is related to the number of oil and gas rigs in use. Total worldwide annual average rig counts decreased by 37.5 percent, from 2,177 in 2019 to 1,361 in 2021 when global economic activity slowed down because of measures taken to slow the spread of the coronavirus (table VII-38).<sup>42</sup> However, total worldwide average rig counts increased by 32.7 percent, from 1,243 in the first half of 2021 to 1,650 in the first half of 2022 after rig counts began to grow in late 2021 as oil and gas prices rose.<sup>43</sup> Global footage of onshore well drilling \*\*\* from \*\*\* feet in 2019 to \*\*\* feet in 2021. Global footage of onshore well drilling was projected to \*\*\* to \*\*\* feet in 2022 (Table IV-39).

**Table VII-38**  
**OCTG: Baker Hughes international rotary rig count, by country or region and period**

Average number of rigs

| Country / Region | 2019  | 2020  | 2021  | Jan-June 2021 | Jan-June 2022 |
|------------------|-------|-------|-------|---------------|---------------|
| United States    | 944   | 436   | 475   | 421           | 674           |
| Canada           | 135   | 90    | 131   | 106           | 156           |
| Latin America    | 190   | 107   | 137   | 128           | 158           |
| Europe           | 149   | 112   | 103   | 99            | 90            |
| Africa           | 117   | 76    | 69    | 60            | 81            |
| Middle East      | 414   | 337   | 265   | 259           | 299           |
| Asia Pacific     | 228   | 193   | 182   | 171           | 191           |
| Total            | 2,177 | 1,352 | 1,361 | 1,243         | 1,650         |

Source: Baker Hughes, "Worldwide Rig Count," September 2, 2022,  
<https://rigcount.bakerhughes.com/static-files/e106a3e4-ddd8-4e7d-93a3-01c3de9e7ac0>.

Note: Oil and gas drilling activity in Canada is higher in the winter when the ground is frozen. In the spring, the movement of equipment is restricted by thawing which causes fields and roads to soften. Therefore, drilling activity often stops in the spring until the ground dries. Canadian Association of Oilwell Drilling Contractors, "Working on a Drilling Rig," accessed August 9, 2022,  
[https://caodc.ca/drilling\\_rig\\_work](https://caodc.ca/drilling_rig_work).

<sup>42</sup> Reuters, "U.S. oil rig count drops to lowest since December 2016: Baker Hughes," April 9, 2020,  
<https://www.reuters.com/article/us-usa-rigs-baker-hughes/us-oil-rig-count-drops-to-lowest-since-december-2016-baker-hughes-idUSKCN21R300>.

<sup>43</sup> Reuters, "U.S. drillers add oil and gas rigs for fifth week in a row -Baker Hughes," October 8, 2021.  
<https://www.reuters.com/business/energy/us-drillers-add-oil-gas-rigs-fifth-week-row-baker-hughes-2021-10-08/>.

**Table VII-39**  
**OCTG: Onshore well footage drilled, by country or region and year**

Millions of feet

| <b>Country / Region</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
|-------------------------|-------------|-------------|-------------|-------------|
| United States           | ***         | ***         | ***         | ***         |
| Canada                  | ***         | ***         | ***         | ***         |
| Latin America           | ***         | ***         | ***         | ***         |
| Europe                  | ***         | ***         | ***         | ***         |
| Africa                  | ***         | ***         | ***         | ***         |
| Middle East             | ***         | ***         | ***         | ***         |
| Asia Pacific            | ***         | ***         | ***         | ***         |
| Russia                  | ***         | ***         | ***         | ***         |
| Central Asia            | ***         | ***         | ***         | ***         |
| China                   | ***         | ***         | ***         | ***         |
| Total                   | ***         | ***         | ***         | ***         |

Source: \*\*\*.

Note: Data for 2022 are projected.

**APPENDIX A**  
**FEDERAL REGISTER NOTICES**



The Commission makes available notices relevant to its investigations and reviews on its website, [www.usitc.gov](http://www.usitc.gov). In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

| Citation                          | Title   | Link  |
|-----------------------------------|---|---|
| 86 FR 56983,<br>October 13, 2021  | <i>Oil Country Tubular Goods From Argentina, Mexico, Russia, and South Korea; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i> | <a href="https://www.govinfo.gov/content/pkg/FR-2021-10-13/pdf/2021-22242.pdf">https://www.govinfo.gov/content/pkg/FR-2021-10-13/pdf/2021-22242.pdf</a> |
| 86 FR 60205,<br>November 1, 2021  | <i>Oil Country Tubular Goods From Argentina, Mexico, and the Russian Federation: Initiation of Less-Than-Fair-Value Investigations</i>  | <a href="https://www.govinfo.gov/content/pkg/FR-2021-11-01/pdf/2021-23715.pdf">https://www.govinfo.gov/content/pkg/FR-2021-11-01/pdf/2021-23715.pdf</a> |
| 86 FR 60210,<br>November 1, 2021  | <i>Oil Country Tubular Goods From the Republic of Korea and the Russian Federation: Initiation of Countervailing Duty Investigations</i>  | <a href="https://www.govinfo.gov/content/pkg/FR-2021-11-01/pdf/2021-23714.pdf">https://www.govinfo.gov/content/pkg/FR-2021-11-01/pdf/2021-23714.pdf</a> |
| 86 FR 67491,<br>November 26, 2021 | <i>Oil Country Tubular Goods From Argentina, Mexico, Russia, and South Korea</i>  | <a href="https://www.govinfo.gov/content/pkg/FR-2021-11-26/pdf/2021-25801.pdf">https://www.govinfo.gov/content/pkg/FR-2021-11-26/pdf/2021-25801.pdf</a> |
| 86 FR 67909,<br>November 30, 2021 | <i>Oil Country Tubular Goods From the Republic of Korea and the Russian Federation: Postponement of Preliminary Determinations in the Countervailing Duty Investigations</i>                            | <a href="https://www.govinfo.gov/content/pkg/FR-2021-11-30/pdf/2021-26025.pdf">https://www.govinfo.gov/content/pkg/FR-2021-11-30/pdf/2021-26025.pdf</a> |
| 87 FR 9034,<br>February 17, 2022  | <i>Oil Country Tubular Goods From Argentina, Mexico, and the Russian Federation: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations</i>                              | <a href="https://www.govinfo.gov/content/pkg/FR-2022-02-17/pdf/2022-03450.pdf">https://www.govinfo.gov/content/pkg/FR-2022-02-17/pdf/2022-03450.pdf</a> |
| 87 FR 14248, March 14, 2022       | <i>Oil Country Tubular Goods From the Republic of Korea: Preliminary Negative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination</i>      | <a href="https://www.govinfo.gov/content/pkg/FR-2022-03-14/pdf/2022-05334.pdf">https://www.govinfo.gov/content/pkg/FR-2022-03-14/pdf/2022-05334.pdf</a> |

| Citation                        | Title   | Link  |
|---------------------------------|---|---|
| 87 FR 14249, March 14, 2022     | <i>Oil Country Tubular Goods From the Russian Federation: Preliminary Affirmative Countervailing Duty Determination, Preliminary Negative Critical Circumstances Determination, and Alignment of Final Determination With Final Antidumping Duty Determination</i>          | <a href="https://www.govinfo.gov/content/pkg/FR-2022-03-14/pdf/2022-05333.pdf">https://www.govinfo.gov/content/pkg/FR-2022-03-14/pdf/2022-05333.pdf</a> |
| 87 FR 28801, May 11, 2022       | <i>Oil Country Tubular Goods From Argentina: Preliminary Affirmative Determinations of Sales at Less Than Fair Value and Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures</i>   | <a href="https://www.govinfo.gov/content/pkg/FR-2022-05-11/pdf/2022-10049.pdf">https://www.govinfo.gov/content/pkg/FR-2022-05-11/pdf/2022-10049.pdf</a> |
| 87 FR 28804, May 11, 2022       | <i>Oil Country Tubular Goods From the Russian Federation: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Critical Circumstances Determination, Postponement of Final Determination, and Extension of Provisional Measures</i> | <a href="https://www.govinfo.gov/content/pkg/FR-2022-05-11/pdf/2022-10051.pdf">https://www.govinfo.gov/content/pkg/FR-2022-05-11/pdf/2022-10051.pdf</a> |
| 87 FR 28808, May 11, 2022       | <i>Oil Country Tubular Goods From Mexico: Preliminary Affirmative Determinations of Sales at Less Than Fair Value and Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures</i>  | <a href="https://www.govinfo.gov/content/pkg/FR-2022-05-11/pdf/2022-10050.pdf">https://www.govinfo.gov/content/pkg/FR-2022-05-11/pdf/2022-10050.pdf</a> |
| 87 FR 35246, June 9, 2022       | <i>Oil Country Tubular Goods From Argentina, Mexico, Russia, and South Korea; Scheduling of the Final Phase of Countervailing Duty and Anti-Dumping Duty Investigations</i>   | <a href="https://www.govinfo.gov/content/pkg/FR-2022-06-09/pdf/2022-12448.pdf">https://www.govinfo.gov/content/pkg/FR-2022-06-09/pdf/2022-12448.pdf</a> |
| 87 FR 59041, September 29, 2022 | <i>Oil Country Tubular Goods From Mexico: Final Affirmative Determinations of Sales at Less Than Fair Value and Critical Circumstances</i>  | <a href="https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21170.pdf">https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21170.pdf</a> |
| 87 FR 59045, September 29, 2022 | <i>Oil Country Tubular Goods From the Russian Federation: Final Affirmative Determination of Sales at Less Than Fair Value, and Final Affirmative Critical Circumstances Determination, in Part</i>   | <a href="https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21182.pdf">https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21182.pdf</a> |

| Citation                           | Title  | Link  |
|------------------------------------|--|---|
| 87 FR 59047,<br>September 29, 2022 | <i>Oil Country Tubular Goods From the Russian Federation: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination</i>    | <a href="https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21179.pdf">https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21179.pdf</a> |
| 87 FR 59054,<br>September 29, 2022 | <i>Oil Country Tubular Goods From Argentina: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances</i> | <a href="https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21184.pdf">https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21184.pdf</a> |
| 87 FR 59056,<br>September 29, 2022 | <i>Oil Country Tubular Goods From the Republic of Korea: Final Affirmative Countervailing Duty Determination</i>   | <a href="https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21181.pdf">https://www.govinfo.gov/content/pkg/FR-2022-09-29/pdf/2022-21181.pdf</a> |





**APPENDIX B**

**LIST OF HEARING WITNESSES**



## CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing via videoconference:

**Subject:** Oil Country Tubular Goods from Argentina, Mexico, Russia, and South Korea

**Inv. Nos.:** 701-TA-671-672 and 731-TA-1571-1573 (Final)

**Date and Time:** September 22, 2022 - 9:30 a.m.

### CONGRESSIONAL APPEARANCES:

**The Honorable Brian Higgins, U.S. Representative, 26<sup>th</sup> District, New York**

**The Honorable Frank J. Mrvan, U.S. Representative, 1<sup>st</sup> District, Indiana**

### OPENING REMARKS:

In Support of Imposition (**Roger B. Schagrin**, Schagrin Associates)  
In Opposition to Imposition (**Frank J. Schweitzer**, White & Case LLP)

### **In Support of Imposition of Antidumping and Countervailing Duty Orders:**

Schagrin Associates  
Washington, DC  
on behalf of

Borusan Mannesmann Pipe U.S., Inc.; PTC Liberty Tubulars LLC; the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC; and Welded Tube USA, Inc.:

**Joel Johnson**, President and Chief Executive Officer, Borusan Mannesmann Pipe U.S., Inc.

**Josh Croix**, Chief Commercial Officer, Borusan Mannesmann Pipe U.S., Inc.

**Cary Hart**, Chief Executive Officer, PTC Liberty Tubulars LLC

**In Support of the Imposition of  
Antidumping and Countervailing Duty Orders (continued):**

**Vincent Fera**, General Counsel, PTC Liberty Tubulars LLC

**Robert S. (Butch) Mandel**, President and Chief Executive Officer,  
Welded Tube USA

**Jeff Hanley**, Vice President Sales - Energy Tubulars and Steel Procurement,  
Welded Tube USA

**Roy Houseman**, Legislative Director, United Steel, Paper and  
Forestry, Rubber, Manufacturing, Energy, Allied  
Industrial and Service Workers International Union,  
AFL-CIO, CLC

**Frank Sams**, President, JD Rush Corporation

**Steve Tait**, President, B&L Pipeco Services Inc.

**Roger B. Schagrin** )  
**Luke A. Meisner** ) – OF COUNSEL  
**Benjamin Bay** )

Cassidy Levy Kent (USA) LLP  
Washington, DC  
on behalf of

United States Steel Tubular Products, Inc.

**Robert J. Beltz**, General Manager - Commercial, United States  
Steel Tubular Products, Inc.

**Scott M. Dorn**, Head of Tubular Solutions, United States  
Steel Tubular Products, Inc.

**Brett Mendenhall**, Chief Executive Officer, P2 Energy Services

**Thomas M. Beline** )  
**Myles S. Getlan** ) – OF COUNSEL  
**Nicole Brunda** )

**In Opposition to Imposition of  
Antidumping and Countervailing Duty Orders:**

White & Case LLP  
Washington, DC  
on behalf of

Tenaris Bay City, Inc.; Maverick Tube Corporation; and  
IPSCO Tubulars Inc. (“Tenaris USA”)  
Tenaris Global Services (USA) Corporation (“TGS USA”)  
Siderca S.A.I.C. (“Siderca”)  
Tubos de Acero de Mexico, S.A. (“TAMSA”)

**Luca Zanotti**, President, USA Operations, Tenaris USA

**Germán Curá**, Vice Chairman of the Board of Directors, Tenaris

**Guillermo Vogel**, Vice Chairman of the Board of Directors, Tenaris

**Kevin Schnurbusch**, U.S. Human Resources Senior Director, Tenaris USA

**Guillermo Moreno**, Chief Commercial Officer USA, Tenaris USA

**Adam Lange**, Vice President of Drilling, Tap Rock Operating, LLC

**Dr. Dean Foreman**, Chief Economist, American Petroleum Institute

**Karr Ingham**, Executive Vice President/Petroleum Economist,  
Texas Alliance of Energy Producers

**Dr. Thomas J. Prusa**, Professor, Department of Economics, Rutgers University

**Gregory J. Spak** )  
**Frank J. Schweitzer** ) – OF COUNSEL  
**Kristina Zissis** )

Winton & Chapman PLLC  
Washington, DC  
on behalf of

TMK Group (“TMK”)

**Michael Chapman** ) – OF COUNSEL

**REBUTTAL/CLOSING REMARKS:**

In Support of Imposition (**Myles S. Getlan**, Cassidy Levy Kent (USA) LLP)  
In Opposition to Imposition (**Gregory J. Spak**, White & Case LLP)

**-END-**

**APPENDIX C**  
**SUMMARY DATA**

Table C-1: OCTG: Summary data concerning the U.S. market, by item and period..... C-3

Table C-2: OCTG: Summary data concerning the U.S. market excluding one U.S. producer \*\*\*,  
by item and period..... C-6



## All producers

**Table C-1**

**OCTG: Summary data concerning the U.S. market, by item and period**

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Productivity=short tons per 1,000 hours; Period changes=percent--exceptions noted

| Item                                    | Reported data |           |           |           |           | Period changes   |         |         |         |
|---|---------------|-----------|-----------|-----------|-----------|------------------|---------|---------|---------|
|   | Calendar year |           |           | Jan-Jun   |           | Comparison years |         |         | Jan-Jun |
|   | 2019          | 2020      | 2021      | 2021      | 2022      | 2019-21          | 2019-20 | 2020-21 | 2021-22 |
| <b>U.S. consumption quantity:</b>       |               |           |           |           |           |                  |         |         |         |
| Amount.....                             | 5,263,588     | 2,650,932 | 3,504,858 | 1,421,323 | 2,424,757 | ▼(33.4)          | ▼(49.6) | ▲32.2   | ▲70.6   |
| Producers' share (fn1).....             | 56.7          | 60.4      | 48.4      | 50.6      | 51.2      | ▼(8.2)           | ▲3.7    | ▼(12.0) | ▲0.6    |
| <b>Importers' share (fn1):</b>          |               |           |           |           |           |                  |         |         |         |
| Argentina.....                          | 3.1           | 0.6       | 4.6       | 5.7       | 2.5       | ▲1.5             | ▼(2.5)  | ▲4.0    | ▼(3.2)  |
| Mexico.....                             | 4.1           | 6.2       | 9.8       | 9.0       | 5.5       | ▲5.8             | ▲2.2    | ▲3.6    | ▼(3.5)  |
| Russia.....                             | 4.1           | 1.9       | 4.2       | 4.1       | 3.4       | ▲0.1             | ▼(2.2)  | ▲2.4    | ▼(0.7)  |
| South Korea, subject.....               | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▲***    | ▼***    |
| Subject sources.....                    | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▼***    |
| South Korea, nonsubject.....            | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▼***    | ▲***    |
| All other sources.....                  | 23.5          | 19.5      | 18.4      | 15.3      | 26.1      | ▼(5.1)           | ▼(4.0)  | ▼(1.1)  | ▲10.8   |
| Nonsubject sources.....                 | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| All import sources.....                 | 43.3          | 39.6      | 51.6      | 49.4      | 48.8      | ▲8.2             | ▼(3.7)  | ▲12.0   | ▼(0.6)  |
| <b>U.S. consumption value:</b>          |               |           |           |           |           |                  |         |         |         |
| Amount.....                             | 7,137,137     | 3,123,077 | 5,117,367 | 1,783,134 | 5,084,166 | ▼(28.3)          | ▼(56.2) | ▲63.9   | ▲185.1  |
| <b>Producers' share (fn1):</b>          |               |           |           |           |           |                  |         |         |         |
| Fully domestic value.....               | 60.4          | 63.4      | 53.5      | 55.5      | 57.9      | ▼(6.9)           | ▲3.0    | ▼(10.0) | ▲2.4    |
| Incremental value added to imports..... | 2.6           | 3.0       | 2.9       | 4.3       | 2.3       | ▲0.3             | ▲0.4    | ▼(0.1)  | ▼(2.0)  |
| Total value.....                        | 63.0          | 66.4      | 56.4      | 59.8      | 60.3      | ▼(6.6)           | ▲3.4    | ▼(10.0) | ▲0.5    |
| <b>Importers' share (fn1):</b>          |               |           |           |           |           |                  |         |         |         |
| Argentina.....                          | 3.0           | 0.7       | 4.0       | 4.5       | 2.2       | ▲1.0             | ▼(2.4)  | ▲3.4    | ▼(2.3)  |
| Mexico.....                             | 4.9           | 7.1       | 9.5       | 8.6       | 5.4       | ▲4.6             | ▲2.2    | ▲2.4    | ▼(3.2)  |
| Russia.....                             | 3.2           | 1.3       | 2.8       | 2.4       | 2.0       | ▼(0.4)           | ▼(1.9)  | ▲1.5    | ▼(0.4)  |
| South Korea, subject.....               | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▲***    | ▼***    |
| Subject sources.....                    | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▼***    |
| South Korea, nonsubject.....            | ***           | ***       | ***       | ***       | ***       | ▼***             | ▲***    | ▼***    | ▼***    |
| All other sources.....                  | 20.2          | 17.8      | 16.5      | 14.7      | 21.3      | ▼(3.7)           | ▼(2.4)  | ▼(1.3)  | ▲6.6    |
| Nonsubject sources.....                 | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| All import sources.....                 | 37.0          | 33.6      | 43.6      | 40.2      | 39.7      | ▲6.6             | ▼(3.4)  | ▲10.0   | ▼(0.5)  |
| <b>U.S. imports from:</b>               |               |           |           |           |           |                  |         |         |         |
| <b>Argentina:</b>                       |               |           |           |           |           |                  |         |         |         |
| Quantity.....                           | 162,875       | 16,735    | 162,640   | 81,015    | 59,593    | ▼(0.1)           | ▼(89.7) | ▲871.9  | ▼(26.4) |
| Value.....                              | 216,803       | 20,331    | 205,993   | 79,842    | 110,312   | ▼(5.0)           | ▼(90.6) | ▲913.2  | ▲38.2   |
| Unit value.....                         | \$1,331       | \$1,215   | \$1,267   | \$986     | \$1,851   | ▼(4.8)           | ▼(8.7)  | ▲4.3    | ▲87.8   |
| Ending inventory quantity.....          | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▼***    |
| <b>Mexico:</b>                          |               |           |           |           |           |                  |         |         |         |
| Quantity.....                           | 214,197       | 164,874   | 344,432   | 127,777   | 132,755   | ▲60.8            | ▼(23.0) | ▲108.9  | ▲3.9    |
| Value.....                              | 350,408       | 222,982   | 488,307   | 153,250   | 273,771   | ▲39.4            | ▼(36.4) | ▲119.0  | ▲78.6   |
| Unit value.....                         | \$1,636       | \$1,352   | \$1,418   | \$1,199   | \$2,062   | ▼(13.3)          | ▼(17.3) | ▲4.8    | ▲71.9   |
| Ending inventory quantity.....          | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▼***    |
| <b>Russia:</b>                          |               |           |           |           |           |                  |         |         |         |
| Quantity.....                           | 215,339       | 49,340    | 148,084   | 58,081    | 81,321    | ▼(31.2)          | ▼(77.1) | ▲200.1  | ▲40.0   |
| Value.....                              | 230,773       | 40,376    | 143,613   | 42,669    | 103,597   | ▼(37.8)          | ▼(82.5) | ▲255.7  | ▲142.8  |
| Unit value.....                         | \$1,072       | \$818     | \$970     | \$735     | \$1,274   | ▼(9.5)           | ▼(23.6) | ▲18.5   | ▲73.4   |
| Ending inventory quantity.....          | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▼***    |
| <b>South Korea, subject:</b>            |               |           |           |           |           |                  |         |         |         |
| Quantity.....                           | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Value.....                              | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Unit value.....                         | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Ending inventory quantity.....          | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▼***    |

Table continued.

Table C-1 Continued

OCTG: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Productivity=short tons per 1,000 hours; Period changes=percent--exceptions noted

| Item  | Reported data |           |           |           |           | Period changes   |         |         |         |
|---|---------------|-----------|-----------|-----------|-----------|------------------|---------|---------|---------|
|   | Calendar year |           |           | Jan-Jun   |           | Comparison years |         |         | Jan-Jun |
|   | 2019          | 2020      | 2021      | 2021      | 2022      | 2019-21          | 2019-20 | 2020-21 | 2021-22 |
| U.S. imports from:                          |               |           |           |           |           |                  |         |         |         |
| Subject sources:                            |               |           |           |           |           |                  |         |         |         |
| Quantity.....                               | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Value.....                                  | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Unit value.....                             | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Ending inventory quantity.....              | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▼***    |
| South Korea, nonsubject:                    |               |           |           |           |           |                  |         |         |         |
| Quantity.....                               | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| Value.....                                  | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit value.....                             | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Ending inventory quantity.....              | ***           | ***       | ***       | ***       | ***       | ▼***             | ▲***    | ▼***    | ▼***    |
| All other sources:                          |               |           |           |           |           |                  |         |         |         |
| Quantity.....                               | 1,238,082     | 517,438   | 644,483   | 217,784   | 633,608   | ▼(47.9)          | ▼(58.2) | ▲24.6   | ▲190.9  |
| Value.....                                  | 1,442,969     | 555,561   | 843,183   | 262,873   | 1,083,098 | ▼(41.6)          | ▼(61.5) | ▲51.8   | ▲312.0  |
| Unit value.....                             | \$1,165       | \$1,074   | \$1,308   | \$1,207   | \$1,709   | ▲12.3            | ▼(7.9)  | ▲21.9   | ▲41.6   |
| Ending inventory quantity.....              | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| Nonsubject sources:                         |               |           |           |           |           |                  |         |         |         |
| Quantity.....                               | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Value.....                                  | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit value.....                             | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Ending inventory quantity.....              | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| All import sources:                         |               |           |           |           |           |                  |         |         |         |
| Quantity.....                               | 2,280,575     | 1,049,735 | 1,806,970 | 702,322   | 1,183,285 | ▼(20.8)          | ▼(54.0) | ▲72.1   | ▲68.5   |
| Value.....                                  | 2,639,123     | 1,048,596 | 2,231,540 | 716,783   | 2,020,588 | ▼(15.4)          | ▼(60.3) | ▲112.8  | ▲181.9  |
| Unit value.....                             | \$1,157       | \$999     | \$1,235   | \$1,021   | \$1,708   | ▲6.7             | ▼(13.7) | ▲23.6   | ▲67.3   |
| Ending inventory quantity.....              | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▼***    |
| U.S. mills' and U.S. processors':           |               |           |           |           |           |                  |         |         |         |
| Mills: Average capacity quantity.....       | 6,779,396     | 6,528,023 | 6,615,136 | 3,297,806 | 3,605,645 | ▼(2.4)           | ▼(3.7)  | ▲1.3    | ▲9.3    |
| Mills: Production quantity.....             | 3,021,579     | 1,559,639 | 1,822,955 | 777,294   | 1,432,956 | ▼(39.7)          | ▼(48.4) | ▲16.9   | ▲84.4   |
| Mills: Capacity utilization (fn1).....      | 44.6          | 23.9      | 27.6      | 23.6      | 39.7      | ▼(17.0)          | ▼(20.7) | ▲3.7    | ▲16.2   |
| Processors: Average capacity quantity.....  | 2,027,784     | 2,027,784 | 1,977,784 | 968,892   | 1,170,760 | ▼(2.5)           | ---     | ▼(2.5)  | ▲20.8   |
| Processors: Production quantity.....        | 840,044       | 426,793   | 636,826   | 332,406   | 448,397   | ▼(24.2)          | ▼(49.2) | ▲49.2   | ▲34.9   |
| Processors: Capacity utilization (fn1)..... | 41.4          | 21.0      | 32.2      | 34.3      | 38.3      | ▼(9.2)           | ▼(20.4) | ▲11.2   | ▲4.0    |
| U.S. shipments (fn2):                       |               |           |           |           |           |                  |         |         |         |
| Quantity.....                               | 2,983,013     | 1,601,197 | 1,697,888 | 719,001   | 1,241,472 | ▼(43.1)          | ▼(46.3) | ▲6.0    | ▲72.7   |
| Value:                                      |               |           |           |           |           |                  |         |         |         |
| Fully domestic value.....                   | 4,310,584     | 1,981,233 | 2,736,274 | 989,625   | 2,944,125 | ▼(36.5)          | ▼(54.0) | ▲38.1   | ▲197.5  |
| Incremental value added to imports..        | 187,430       | 93,248    | 149,553   | 76,726    | 119,453   | ▼(20.2)          | ▼(50.2) | ▲60.4   | ▲55.7   |
| Total value.....                            | 4,498,014     | 2,074,481 | 2,885,827 | 1,066,351 | 3,063,578 | ▼(35.8)          | ▼(53.9) | ▲39.1   | ▲187.3  |
| Unit value.....                             | \$1,445       | \$1,237   | \$1,612   | \$1,376   | \$2,371   | ▲11.5            | ▼(14.4) | ▲30.2   | ▲72.3   |
| Export shipments:                           |               |           |           |           |           |                  |         |         |         |
| Quantity.....                               | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Value.....                                  | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit value.....                             | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Mills: Ending inventory quantity.....       | 396,431       | 176,106   | 228,092   | 192,099   | 344,664   | ▼(42.5)          | ▼(55.6) | ▲29.5   | ▲79.4   |
| Mills: Inv./total shipments (fn1).....      | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Processors: Ending inventory quantity.....  | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| Processors: Inv./total shipments (fn1)..... | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Production workers.....                     | 8,581         | 4,728     | 4,779     | 4,128     | 6,118     | ▼(44.3)          | ▼(44.9) | ▲1.1    | ▲48.2   |
| Hours worked (1,000s).....                  | 21,132        | 11,033    | 11,279    | 5,307     | 8,288     | ▼(46.6)          | ▼(47.8) | ▲2.2    | ▲56.2   |
| Wages paid (\$1,000).....                   | 646,767       | 347,692   | 378,001   | 165,102   | 276,834   | ▼(41.6)          | ▼(46.2) | ▲8.7    | ▲67.7   |
| Hourly wages (dollars per hour).....        | \$30.61       | \$31.51   | \$33.51   | \$31.11   | \$33.40   | ▲9.5             | ▲3.0    | ▲6.3    | ▲7.4    |
| Mills: Productivity.....                    | 201.2         | 211.4     | 253.8     | 229.0     | 264.2     | ▲26.1            | ▲5.0    | ▲20.1   | ▲15.4   |
| Mills: Unit labor costs.....                | \$178         | \$179     | \$164     | \$164     | \$155     | ▼(7.8)           | ▲0.3    | ▼(8.1)  | ▼(5.4)  |
| Processors: Productivity.....               | 137.3         | 116.8     | 155.5     | 173.9     | 156.6     | ▲13.2            | ▼(15.0) | ▲33.1   | ▼(9.9)  |
| Processors: Unit labor costs.....           | \$128         | \$160     | \$123     | \$113     | \$122     | ▼(4.2)           | ▲25.2   | ▼(23.5) | ▲7.5    |

Table continued.

**Table C-1 Continued**

**OCTG: Summary data concerning the U.S. market, by item and period**

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Productivity=short tons per 1,000 hours; Period changes=percent--exceptions noted

| Item   | Reported data |           |           |           |           | Period changes   |         |         |         |
|--|---------------|-----------|-----------|-----------|-----------|------------------|---------|---------|---------|
|  | Calendar year |           | Jan-Jun   |           |           | Comparison years |         |         | Jan-Jun |
|  | 2019          | 2020      | 2021      | 2021      | 2022      | 2019-21          | 2019-20 | 2020-21 | 2021-22 |
| <b>U.S. mills' and non-toll processors':</b> |               |           |           |           |           |                  |         |         |         |
| Net sales:                                   |               |           |           |           |           |                  |         |         |         |
| Quantity.....                                | 3,216,609     | 1,768,749 | 1,808,460 | 787,864   | 1,333,320 | ▼(43.8)          | ▼(45.0) | ▲2.2    | ▲69.2   |
| Value.....                                   | 4,587,912     | 2,154,309 | 2,902,119 | 1,076,861 | 3,093,910 | ▼(36.7)          | ▼(53.0) | ▲34.7   | ▲187.3  |
| Unit value.....                              | \$1,426       | \$1,218   | \$1,605   | \$1,367   | \$2,320   | ▲12.5            | ▼(14.6) | ▲31.8   | ▲69.8   |
| Cost of goods sold (COGS).....               | 4,441,344     | 2,524,274 | 2,842,884 | 1,176,431 | 2,393,727 | ▼(36.0)          | ▼(43.2) | ▲12.6   | ▲103.5  |
| Gross profit or (loss) (fn3).....            | 146,568       | (369,965) | 59,235    | (99,570)  | 700,183   | ▼(59.6)          | ▼---    | ▲---    | ▲---    |
| SG&A expenses.....                           | 368,497       | 289,288   | 314,133   | 136,735   | 191,913   | ▼(14.8)          | ▼(21.5) | ▲8.6    | ▲40.4   |
| Operating income or (loss) (fn3).....        | (221,929)     | (659,253) | (254,898) | (236,305) | 508,270   | ▼---             | ▼---    | ▲---    | ▲---    |
| Net income or (loss) (fn3).....              | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Unit COGS.....                               | \$1,381       | \$1,427   | \$1,572   | \$1,493   | \$1,795   | ▲13.9            | ▲3.4    | ▲10.1   | ▲20.2   |
| Unit SG&A expenses.....                      | \$115         | \$164     | \$174     | \$174     | \$144     | ▲51.6            | ▲42.8   | ▲6.2    | ▼(17.1) |
| Unit operating income or (loss) (fn3).....   | \$(69)        | \$(373)   | \$(141)   | \$(300)   | \$381     | ▼---             | ▼---    | ▲---    | ▲---    |
| Unit net income or (loss) (fn3).....         | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| COGS/sales (fn1).....                        | 96.8          | 117.2     | 98.0      | 109.2     | 77.4      | ▲1.2             | ▲20.4   | ▼(19.2) | ▼(31.9) |
| Operating income or (loss)/sales (fn1).....  | (4.8)         | (30.6)    | (8.8)     | (21.9)    | 16.4      | ▼(3.9)           | ▼(25.8) | ▲21.8   | ▲38.4   |
| Net income or (loss)/sales (fn1).....        | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| <b>U.S. toll processors':</b>                |               |           |           |           |           |                  |         |         |         |
| Net tolling:                                 |               |           |           |           |           |                  |         |         |         |
| Quantity.....                                | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Value.....                                   | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit value.....                              | ***           | ***       | ***       | ***       | ***       | ▼***             | ▲***    | ▼***    | ▲***    |
| Total cost of tolling services (COTS).....   | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Gross profit or (loss) (fn3).....            | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| G&A expenses.....                            | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Operating income or (loss) (fn3).....        | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit COTS.....                               | ***           | ***       | ***       | ***       | ***       | ▼***             | ▲***    | ▼***    | ▲***    |
| Unit G&A expenses.....                       | ***           | ***       | ***       | ***       | ***       | ▼***             | ▲***    | ▼***    | ▼***    |
| Unit operating income or (loss) (fn3).....   | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| COTS/sales (fn1).....                        | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▼***    | ▼***    |
| Operating income or (loss)/sales (fn1).....  | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| <b>U.S. mills' and U.S. processors':</b>     |               |           |           |           |           |                  |         |         |         |
| Capital expenditures.....                    | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| Research and development expenses.....       | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▼***    |
| Net assets.....                              | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ***     |

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Quantity for U.S. producers' U.S. shipments reflects mill's U.S. shipment quantities. Value for U.S. producers' U.S. shipments reflects OCTG products sold in the United States from domestically manufactured OCTG (including the incremental value from U.S. non-toll processors' heat treatment of domestic OCTG), as well as the incremental value from U.S. processors' heat treatment of imported OCTG. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import.

fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, imports value data reflect landed duty-paid values. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

## Related party exclusion

**Table C-2**

**OCTG: Summary data concerning the U.S. market excluding one U.S. producer \*\*\*, by item and period**

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Productivity=short tons per 1,000 hours; Period changes=percent—exceptions noted

| Item                              | Reported data |           |           |           |           | Period changes   |         |         |         |  |
|-----------------------------------|---------------|-----------|-----------|-----------|-----------|------------------|---------|---------|---------|--|
|                                   | Calendar year |           |           | Jan-Jun   |           | Comparison years |         |         | Jan-Jun |  |
|                                   | 2019          | 2020      | 2021      | 2021      | 2022      | 2019-21          | 2019-20 | 2020-21 | 2021-22 |  |
| <b>U.S. consumption quantity:</b> |               |           |           |           |           |                  |         |         |         |  |
| Amount.....                       | 5,263,588     | 2,650,932 | 3,504,858 | 1,421,323 | 2,424,757 | ▼(33.4)          | ▼(49.6) | ▲32.2   | ▲70.6   |  |
| <b>Producers' share (fn1):</b>    |               |           |           |           |           |                  |         |         |         |  |
| Included producers.....           | ***           | ***       | ***       | ***       | ***       | ▼***             | ▲***    | ▼***    | ▲***    |  |
| Excluded producers.....           | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▼***    | ▲***    |  |
| All producers.....                | 56.7          | 60.4      | 48.4      | 50.6      | 51.2      | ▼(8.2)           | ▲3.7    | ▼(12.0) | ▲0.6    |  |
| <b>Importers' share (fn1):</b>    |               |           |           |           |           |                  |         |         |         |  |
| Argentina.....                    | 3.1           | 0.6       | 4.6       | 5.7       | 2.5       | ▲1.5             | ▼(2.5)  | ▲4.0    | ▼(3.2)  |  |
| Mexico.....                       | 4.1           | 6.2       | 9.8       | 9.0       | 5.5       | ▲5.8             | ▲2.2    | ▲3.6    | ▼(3.5)  |  |
| Russia.....                       | 4.1           | 1.9       | 4.2       | 4.1       | 3.4       | ▲0.1             | ▼(2.2)  | ▲2.4    | ▼(0.7)  |  |
| South Korea, subject.....         | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▲***    | ▼***    |  |
| Subject sources.....              | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▼***    |  |
| South Korea, nonsubject.....      | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▲***    | ▲***    |  |
| All other sources.....            | 23.5          | 19.5      | 18.4      | 15.3      | 26.1      | ▼(5.1)           | ▼(4.0)  | ▼(1.1)  | ▲10.8   |  |
| Nonsubject sources.....           | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |  |
| All import sources.....           | 43.3          | 39.6      | 51.6      | 49.4      | 48.8      | ▲8.2             | ▼(3.7)  | ▲12.0   | ▼(0.6)  |  |
| <b>U.S. consumption value:</b>    |               |           |           |           |           |                  |         |         |         |  |
| Amount.....                       | 7,137,137     | 3,123,077 | 5,117,367 | 1,783,134 | 5,084,166 | ▼(28.3)          | ▼(56.2) | ▲63.9   | ▲185.1  |  |
| <b>Producers' share (fn1):</b>    |               |           |           |           |           |                  |         |         |         |  |
| Included producers.....           | ***           | ***       | ***       | ***       | ***       | ▼***             | ▲***    | ▼***    | ▲***    |  |
| Excluded producers.....           | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▲***    | ▲***    |  |
| All producers.....                | 63.0          | 66.4      | 56.4      | 59.8      | 60.3      | ▼(6.6)           | ▲3.4    | ▼(10.0) | ▲0.5    |  |
| <b>Importers' share (fn1):</b>    |               |           |           |           |           |                  |         |         |         |  |
| Argentina.....                    | 3.0           | 0.7       | 4.0       | 4.5       | 2.2       | ▲1.0             | ▼(2.4)  | ▲3.4    | ▼(2.3)  |  |
| Mexico.....                       | 4.9           | 7.1       | 9.5       | 8.6       | 5.4       | ▲4.6             | ▲2.2    | ▲2.4    | ▼(3.2)  |  |
| Russia.....                       | 3.2           | 1.3       | 2.8       | 2.4       | 2.0       | ▼(0.4)           | ▼(1.9)  | ▲1.5    | ▼(0.4)  |  |
| South Korea, subject.....         | ***           | ***       | ***       | ***       | ***       | ▲***             | ▲***    | ▲***    | ▼***    |  |
| Subject sources.....              | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▼***    |  |
| South Korea, nonsubject.....      | ***           | ***       | ***       | ***       | ***       | ▼***             | ▲***    | ▼***    | ▼***    |  |
| All other sources.....            | 20.2          | 17.8      | 16.5      | 14.7      | 21.3      | ▼(3.7)           | ▼(2.4)  | ▼(1.3)  | ▲6.6    |  |
| Nonsubject sources.....           | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▲***    |  |
| All import sources.....           | 37.0          | 33.6      | 43.6      | 40.2      | 39.7      | ▲6.6             | ▼(3.4)  | ▲10.0   | ▼(0.5)  |  |
| <b>U.S. imports from:</b>         |               |           |           |           |           |                  |         |         |         |  |
| <b>Argentina:</b>                 |               |           |           |           |           |                  |         |         |         |  |
| Quantity.....                     | 162,875       | 16,735    | 162,640   | 81,015    | 59,593    | ▼(0.1)           | ▼(89.7) | ▲871.9  | ▼(26.4) |  |
| Value.....                        | 216,803       | 20,331    | 205,993   | 79,842    | 110,312   | ▼(5.0)           | ▼(90.6) | ▲913.2  | ▲38.2   |  |
| Unit value.....                   | \$1,331       | \$1,215   | \$1,267   | \$986     | \$1,851   | ▼(4.8)           | ▼(8.7)  | ▲4.3    | ▲87.8   |  |
| Ending inventory quantity.....    | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▲***    | ▼***    |  |
| <b>Mexico:</b>                    |               |           |           |           |           |                  |         |         |         |  |
| Quantity.....                     | 214,197       | 164,874   | 344,432   | 127,777   | 132,755   | ▲60.8            | ▼(23.0) | ▲108.9  | ▲3.9    |  |
| Value.....                        | 350,408       | 222,982   | 488,307   | 153,250   | 273,771   | ▲39.4            | ▼(36.4) | ▲119.0  | ▲78.6   |  |
| Unit value.....                   | \$1,636       | \$1,352   | \$1,418   | \$1,199   | \$2,062   | ▼(13.3)          | ▼(17.3) | ▲4.8    | ▲71.9   |  |
| Ending inventory quantity.....    | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▼***    |  |
| <b>Russia:</b>                    |               |           |           |           |           |                  |         |         |         |  |
| Quantity.....                     | 215,339       | 49,340    | 148,084   | 58,081    | 81,321    | ▼(31.2)          | ▼(77.1) | ▲200.1  | ▲40.0   |  |
| Value.....                        | 230,773       | 40,376    | 143,613   | 42,669    | 103,597   | ▼(37.8)          | ▼(82.5) | ▲255.7  | ▲142.8  |  |
| Unit value.....                   | \$1,072       | \$818     | \$970     | \$735     | \$1,274   | ▼(9.5)           | ▼(23.6) | ▲18.5   | ▲73.4   |  |
| Ending inventory quantity.....    | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▼***    |  |
| <b>South Korea, subject:</b>      |               |           |           |           |           |                  |         |         |         |  |
| Quantity.....                     | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |  |
| Value.....                        | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |  |
| Unit value.....                   | ***           | ***       | ***       | ***       | ***       | ▲***             | ▼***    | ▲***    | ▲***    |  |
| Ending inventory quantity.....    | ***           | ***       | ***       | ***       | ***       | ▼***             | ▼***    | ▼***    | ▼***    |  |

Table continued.

Table C-2 Continued

OCTG: Summary data concerning the U.S. market excluding one U.S. producer \*\*\*, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Productivity=short tons per 1,000 hours; Period changes=percent--exceptions noted

| Item  | Reported data |           |           |         |           | Period changes   |         |         |         |
|---|---------------|-----------|-----------|---------|-----------|------------------|---------|---------|---------|
|   | Calendar year |           |           | Jan-Jun |           | Comparison years |         |         | Jan-Jun |
|   | 2019          | 2020      | 2021      | 2021    | 2022      | 2019-21          | 2019-20 | 2020-21 | 2021-22 |
| U.S. imports from:  |               |           |           |         |           |                  |         |         |         |
| Subject sources:  |               |           |           |         |           |                  |         |         |         |
| Quantity.....   | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Value.....  | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Unit value.....   | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Ending inventory quantity.....                                      | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▼***    |
| South Korea, nonsubject:  |               |           |           |         |           |                  |         |         |         |
| Quantity.....   | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| Value.....  | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit value.....   | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Ending inventory quantity.....                                      | ***           | ***       | ***       | ***     | ***       | ▼***             | ▲***    | ▼***    | ▼***    |
| All other sources:  |               |           |           |         |           |                  |         |         |         |
| Quantity.....   | 1,238,082     | 517,438   | 644,483   | 217,784 | 633,608   | ▼(47.9)          | ▼(58.2) | ▲24.6   | ▲190.9  |
| Value.....  | 1,442,969     | 555,561   | 843,183   | 262,873 | 1,083,098 | ▼(41.6)          | ▼(61.5) | ▲51.8   | ▲312.0  |
| Unit value.....   | \$1,165       | \$1,074   | \$1,308   | \$1,207 | \$1,709   | ▲12.3            | ▼(7.9)  | ▲21.9   | ▲41.6   |
| Ending inventory quantity.....                                      | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| Nonsubject sources:   |               |           |           |         |           |                  |         |         |         |
| Quantity.....   | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Value.....  | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit value.....   | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Ending inventory quantity.....                                      | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| All import sources:   |               |           |           |         |           |                  |         |         |         |
| Quantity.....   | 2,280,575     | 1,049,735 | 1,806,970 | 702,322 | 1,183,285 | ▼(20.8)          | ▼(54.0) | ▲72.1   | ▲68.5   |
| Value.....  | 2,639,123     | 1,048,596 | 2,231,540 | 716,783 | 2,020,588 | ▼(15.4)          | ▼(60.3) | ▲112.8  | ▲181.9  |
| Unit value.....   | \$1,157       | \$999     | \$1,235   | \$1,021 | \$1,708   | ▲6.7             | ▼(13.7) | ▲23.6   | ▲67.3   |
| Ending inventory quantity.....                                      | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▼***    |
| Included U.S. mills <sup>a</sup> and U.S. processors <sup>b</sup> : |               |           |           |         |           |                  |         |         |         |
| Mills: Average capacity quantity.....                               | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Mills: Production quantity.....                                     | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Mills: Capacity utilization (fn1).....                              | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Processors: Average capacity quantity.....                          | ***           | ***       | ***       | ***     | ***       | ▼***             | ***     | ▼***    | ▲***    |
| Processors: Production quantity.....                                | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Processors: Capacity utilization (fn1).....                         | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| U.S. shipments (fn2):   |               |           |           |         |           |                  |         |         |         |
| Quantity.....   | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Value.....  | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit value.....   | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Export shipments:   |               |           |           |         |           |                  |         |         |         |
| Quantity.....   | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Value.....  | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Unit value.....   | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Mills: Ending inventory quantity.....                               | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Mills: Inv./total shipments (fn1).....                              | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Processors: Ending inventory quantity.....                          | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| Processors: Inv./total shipments (fn1).....                         | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▲***    |
| Production workers.....   | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Hours worked (1,000s).....  | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▼***    | ▲***    |
| Wages paid (\$1,000).....   | ***           | ***       | ***       | ***     | ***       | ▼***             | ▼***    | ▲***    | ▲***    |
| Hourly wages (dollars per hour).....                                | ***           | ***       | ***       | ***     | ***       | ▲***             | ▲***    | ▲***    | ▲***    |
| Mills: Productivity.....  | ***           | ***       | ***       | ***     | ***       | ▲***             | ▲***    | ▲***    | ▲***    |
| Mills: Unit labor costs.....  | ***           | ***       | ***       | ***     | ***       | ▼***             | ▲***    | ▼***    | ▼***    |
| Processors: Productivity.....                                       | ***           | ***       | ***       | ***     | ***       | ▲***             | ▼***    | ▲***    | ▼***    |
| Processors: Unit labor costs.....                                   | ***           | ***       | ***       | ***     | ***       | ▼***             | ▲***    | ▼***    | ▲***    |

Table continued.

Table C-2 Continued

OCTG: Summary data concerning the U.S. market excluding one U.S. producer\*\*\*, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Productivity=short tons per 1,000 hours; Period changes=percent--exceptions noted

| Item   | Reported data |      |      |         |      | Period changes   |         |         |         |  |
|--|---------------|------|------|---------|------|------------------|---------|---------|---------|--|
|  | Calendar year |      |      | Jan-Jun |      | Comparison years |         |         | Jan-Jun |  |
|  | 2019          | 2020 | 2021 | 2021    | 2022 | 2019-21          | 2019-20 | 2020-21 | 2021-22 |  |
| Included U.S. mills' and non-toll processors': |               |      |      |         |      |                  |         |         |         |  |
| Net sales:                                     |               |      |      |         |      |                  |         |         |         |  |
| Quantity.....                                  | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Value.....                                     | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Unit value.....                                | ***           | ***  | ***  | ***     | ***  | ▲***             | ▼***    | ▲***    | ▲***    |  |
| Cost of goods sold (COGS).....                 | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Gross profit or (loss) (fn3).....              | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| SG&A expenses.....                             | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Operating income or (loss) (fn3).....          | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Net income or (loss) (fn3).....                | ***           | ***  | ***  | ***     | ***  | ▲***             | ▼***    | ▲***    | ▲***    |  |
| Unit COGS.....                                 | ***           | ***  | ***  | ***     | ***  | ▲***             | ▲***    | ▲***    | ▲***    |  |
| Unit SG&A expenses.....                        | ***           | ***  | ***  | ***     | ***  | ▲***             | ▲***    | ▲***    | ▼***    |  |
| Unit operating income or (loss) (fn3).....     | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Unit net income or (loss) (fn3).....           | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| COGS/sales (fn1).....                          | ***           | ***  | ***  | ***     | ***  | ▲***             | ▲***    | ▼***    | ▼***    |  |
| Operating income or (loss)/sales (fn1).....    | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Net income or (loss)/sales (fn1).....          | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Included U.S. toll processors':                |               |      |      |         |      |                  |         |         |         |  |
| Net tolling:                                   |               |      |      |         |      |                  |         |         |         |  |
| Quantity.....                                  | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Value.....                                     | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Unit value.....                                | ***           | ***  | ***  | ***     | ***  | ▲***             | ▲***    | ▼***    | ▲***    |  |
| Total cost of tolling services (COTS).....     | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Gross profit or (loss) (fn3).....              | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| G&A expenses.....                              | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ▲***    |  |
| Operating income or (loss) (fn3).....          | ***           | ***  | ***  | ***     | ***  | ▲***             | ▼***    | ▲***    | ▲***    |  |
| Unit COTS.....                                 | ***           | ***  | ***  | ***     | ***  | ▼***             | ▲***    | ▼***    | ▲***    |  |
| Unit G&A expenses.....                         | ***           | ***  | ***  | ***     | ***  | ▲***             | ▲***    | ▼***    | ▼***    |  |
| Unit operating income or (loss) (fn3).....     | ***           | ***  | ***  | ***     | ***  | ▲***             | ▼***    | ▲***    | ▲***    |  |
| COTS/sales (fn1).....                          | ***           | ***  | ***  | ***     | ***  | ▼***             | ▲***    | ▼***    | ▼***    |  |
| Operating income or (loss)/sales (fn1).....    | ***           | ***  | ***  | ***     | ***  | ▲***             | ▼***    | ▲***    | ▲***    |  |
| Included U.S. mills' and processors':          |               |      |      |         |      |                  |         |         |         |  |
| Capital expenditures.....                      | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▼***    | ▲***    |  |
| Research and development expenses.....         | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▼***    | ▼***    |  |
| Net assets.....                                | ***           | ***  | ***  | ***     | ***  | ▼***             | ▼***    | ▲***    | ***     |  |

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Quantity for U.S. producers' U.S. shipments reflects mill's U.S. shipment quantities. Value for U.S. producers' U.S. shipments reflects OCTG products sold in the United States from domestically manufactured OCTG (including the incremental value added by U.S. processors to domestic OCTG), as well as the incremental value added by U.S. processors to imported OCTG. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import. Unit values are based on the fully domestic value.

fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, import value data reflect landed duty-paid values. 508-compliant tables containing these data are contained in Appendix H and K of this report.

**APPENDIX D**

**SECTION 232 PROCLAMATIONS**





**Table D-1**  
**Section 232 national-security tariff actions: Presidential proclamations affecting imports of steel articles, since April 2017**

| <b>Trade partner</b> | <b>Effective date and duration</b> | <b>Tariff action</b>   | <b>Federal Register Notice</b> |
|----------------------|------------------------------------|--|--------------------------------|
| Not applicable       | April 19, 2017                     | The U.S. Department of Commerce (“Commerce”) announced the institution of an investigation, by its U.S. Bureau of Industry and Security (“BIS”), into the potential impact of imported steel mill products on national security under section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. 1862). | 82 FR 19205                    |
| Not applicable       | January 11, 2018                   | The Secretary of Commerce submitted the BIS Section 232 steel imports report to the President.   | 83 FR 11625                    |
| General action       | March 23, 2018, to present         | The President imposed 25 percent ad valorem national-security duties on U.S. steel imports.  | 83 FR 11625                    |
| Argentina            | March 23, 2018, to April 30, 2018  | Exempted from duties.  | 83 FR 13361                    |
| Argentina            | May 1, 2018, to May 31, 2018       | Exemption from duties continued.   | 83 FR 20683                    |
| Argentina            | June 1, 2018, to present           | Exemption from duties continued, but subject to annual absolute quota limits.  | 83 FR 25857                    |
| Australia            | March 23, 2018, to April 30, 2018  | Exempted from duties.  | 83 FR 13361                    |
| Australia            | May 1, 2018, to May 31, 2018       | Exemption from duties continued.   | 83 FR 20683                    |
| Australia            | June 1, 2018, to present           | Exemption from duties continued.   | 83 FR 40429                    |
| Brazil               | March 23, 2018, to April 30, 2018  | Exempted from duties.  | 83 FR 13361                    |
| Brazil               | May 1, 2018, to May 31, 2018       | Exemption from duties continued.   | 83 FR 20683                    |
| Brazil               | June 1, 2018, to present           | Exemption from duties continued, but subject to annual absolute quota limits.  | 83 FR 25857                    |

Table continued.

**Table D-1 Continued**

**Section 232 national-security tariff actions: Presidential proclamations affecting imports of steel articles, since April 2017**

| <b>Trade partner</b>                   | <b>Effective date and duration</b>    | <b>Tariff action</b>   | <b>Federal Register Notice</b> |
|--|---------------------------------------|--|--------------------------------|
| Canada                                 | March 23, 2018, to May 31, 2018       | Exempted from duties.  | 83 FR 11625                    |
| Canada                                 | June 1, 2018, to May 19, 2019         | Exemption from duties not continued.   | 83 FR 20683                    |
| Canada                                 | May 20, 2019, to present              | Exemption from duties reinstated.  | 84 FR 23987                    |
| European Union (“EU”) member countries | March 23, 2018, to April 30, 2018     | Exempted from duties.  | 83 FR 13361                    |
| EU member countries                    | May 1, 2018, to May 31, 2018          | Exemption from duties continued.   | 83 FR 20683                    |
| EU member countries                    | June 1, 2018, to December 31, 2021    | Exemption from duties not continued.   | 83 FR 20683                    |
| EU member countries                    | January 1, 2022, to December 31, 2023 | Exempted from duties, but each EU member country subject to individual tariff rate quotas and a “melt and pour” requirement. | 87 FR 11                       |
| Japan                                  | April 1, 2022, to present             | Exempted from duties, but subject to tariff rate quotas and a “melt and pour” requirement.                                   | 87 FR 19351                    |
| Mexico                                 | March 23, 2018, to May 31, 2018       | Exempted from duties.  | 83 FR 11625                    |
| Mexico                                 | June 1, 2018, to May 19, 2019         | Exemption from duties not continued.   | 83 FR 20683                    |
| Mexico                                 | May 20, 2019, to present              | Exemption from duties reinstated.  | 84 FR 23987                    |
| South Korea                            | March 23, 2018, to April 30, 2018     | Exempted from duties.  | 83 FR 13361                    |
| South Korea                            | May 1, 2018, to present               | Exemption from duties continued, but subject to annual absolute quota limits.  | 83 FR 20683                    |
| Turkey                                 | August 13, 2018, to May 20, 2019      | Duty rate doubled to 50 percent ad valorem.  | 83 FR 40429                    |
| Turkey                                 | May 21, 2019, to present              | Duty rate reduced from 50 percent to 25 percent ad valorem.  | 84 FR 23421                    |
| Ukraine                                | June 1, 2022, to June 1, 2023         | Exempted from duties for one year.   | 87 FR 33407                    |

Table continued.

**Table D-1 Continued****Section 232 national-security tariff actions: Presidential proclamations affecting imports of steel articles, since April 2017**

| <b>Trade partner</b> | <b>Effective date and duration</b> | <b>Tariff action</b>   | <b>Federal Register Notice</b> |
|----------------------|------------------------------------|--|--------------------------------|
| United Kingdom       | March 23, 2018, to April 30, 2018  | Exempted from duties for EU member countries including the United Kingdom.                             | 83 FR 13361                    |
| United Kingdom       | May 1, 2018, to May 31, 2018       | Exemption from duties continued for EU member countries including the United Kingdom.                  | 83 FR 20683                    |
| United Kingdom       | June 1, 2018 to May 31, 2022       | Exemption from duties not continued for EU member countries including the United Kingdom.              | 83 FR 20683                    |
| United Kingdom       | June 1, 2022, to present           | Exemption from duties reinstated, but subject to tariff rate quotas and a “melt and pour” requirement. | 87 FR 33591                    |

Sources: 82 FR 19205, April 26, 2017; 83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23421, May 21, 2019; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022.

Note: Presidential Proclamation 9705 (clause (1)) defined “steel articles” at the Harmonized Tariff Schedule of the United States (“HTS”) 6-digit level as: 7206.10 through 7216.50, 7216.99 through 7301.10, 7302.10, 7302.40 through 7302.90, and 7304.10 through 7306.90, including any subsequent revisions to these HTS classifications (83 FR 11625, March 15, 2018).

Note: The United Kingdom officially completed its withdrawal from EU membership on January 31, 2021. EU, “Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community,” *Official Journal of the European Union*, L 29/7, January 31, 2020, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12020W/TXT>.

Note: Presidential Proclamation 9705, March 8, 2018, granted the Secretary of Commerce the authority to exclude steel articles for which there is a lack of domestic production, or to exclude steel articles from such restrictions for specific national security considerations (83 FR 11625, March 15, 2018). The BIS published an interim final rule establishing this exclusion process (83 FR 46026, September 11, 2018).

Note: Presidential Proclamation 9980, January 24, 2020, expanded the scope of the Section 232 measures to include imports of certain derivative (fabricated) steel articles, effective February 8, 2020 (85 FR 5281, January 29, 2020).

Note: Presidential Proclamation 10328, December 27, 2021, specified that steel articles must be “melted and poured” in an EU member country to qualify for duty-free in-quota treatment (87 FR 11, January 3, 2022).

Note: Presidential Proclamation 10356, March 31, 2022, specified that steel articles must be “melted and poured” in Japan to qualify for duty-free in-quota treatment (87 FR 19351, April 1, 2022).

Note: Presidential Proclamation 10406, May 31, 2022, specified that steel articles must be “melted and poured” in the United Kingdom (“UK”) to qualify for duty-free in-quota treatment. Steel articles originating in an EU member country, but contains steel melted and poured in the United Kingdom, can qualify for duty-free in-UK sub-quota treatment (87 FR 33591, June 3, 2022).



**APPENDIX E**

**OIL AND NATURAL GAS PRICES**



**Table E-1****Crude oil: Price in USD per barrel of WTI spot f.o.b. Cushing, OK, by month, January 2019-August 2022**

Price in dollars per barrel

| Year | Month     | Crude oil price |
|------|-----------|-----------------|
| 2019 | January   | 51.38           |
| 2019 | February  | 54.95           |
| 2019 | March     | 58.15           |
| 2019 | April     | 63.86           |
| 2019 | May       | 60.83           |
| 2019 | June      | 54.66           |
| 2019 | July      | 57.35           |
| 2019 | August    | 54.81           |
| 2019 | September | 56.95           |
| 2019 | October   | 53.96           |
| 2019 | November  | 57.03           |
| 2019 | December  | 59.88           |
| 2020 | January   | 57.52           |
| 2020 | February  | 50.54           |
| 2020 | March     | 29.21           |
| 2020 | April     | 16.55           |
| 2020 | May       | 28.56           |
| 2020 | June      | 38.31           |
| 2020 | July      | 40.71           |
| 2020 | August    | 42.34           |
| 2020 | September | 39.63           |
| 2020 | October   | 39.40           |
| 2020 | November  | 40.94           |
| 2020 | December  | 47.02           |
| 2021 | January   | 52.00           |
| 2021 | February  | 59.04           |
| 2021 | March     | 62.33           |
| 2021 | April     | 61.72           |
| 2021 | May       | 65.17           |
| 2021 | June      | 71.38           |
| 2021 | July      | 72.49           |
| 2021 | August    | 67.73           |
| 2021 | September | 71.65           |
| 2021 | October   | 81.48           |
| 2021 | November  | 79.15           |
| 2021 | December  | 71.71           |
| 2022 | January   | 83.22           |
| 2022 | February  | 91.64           |
| 2022 | March     | 108.50          |
| 2022 | April     | 101.78          |
| 2022 | May       | 109.55          |
| 2022 | June      | 114.84          |
| 2022 | July      | 101.62          |
| 2022 | August    | 93.67           |

Source: U.S. Energy Information Administration, Crude Oil Prices: West Texas Intermediate (WTI) - Cushing, Oklahoma (MCOILWTICO), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/MCOILWTICO>, July 18, August 25, and September 26, 2022.

**Table E-2****Natural gas: Price in USD per million Btu of natural gas (Henry Hub spot price), by month, January 2019-August 2022**

Price in dollars per million Btu

| Year | Month     | Henry Hub Natural Gas Spot Price |
|------|-----------|----------------------------------|
| 2019 | January   | 3.11                             |
| 2019 | February  | 2.69                             |
| 2019 | March     | 2.95                             |
| 2019 | April     | 2.65                             |
| 2019 | May       | 2.64                             |
| 2019 | June      | 2.40                             |
| 2019 | July      | 2.37                             |
| 2019 | August    | 2.22                             |
| 2019 | September | 2.56                             |
| 2019 | October   | 2.33                             |
| 2019 | November  | 2.65                             |
| 2019 | December  | 2.22                             |
| 2020 | January   | 2.02                             |
| 2020 | February  | 1.91                             |
| 2020 | March     | 1.79                             |
| 2020 | April     | 1.74                             |
| 2020 | May       | 1.75                             |
| 2020 | June      | 1.63                             |
| 2020 | July      | 1.77                             |
| 2020 | August    | 2.30                             |
| 2020 | September | 1.92                             |
| 2020 | October   | 2.39                             |
| 2020 | November  | 2.61                             |
| 2020 | December  | 2.59                             |
| 2021 | January   | 2.71                             |
| 2021 | February  | 5.35                             |
| 2021 | March     | 2.62                             |
| 2021 | April     | 2.66                             |
| 2021 | May       | 2.91                             |
| 2021 | June      | 3.26                             |
| 2021 | July      | 3.84                             |
| 2021 | August    | 4.07                             |
| 2021 | September | 5.16                             |
| 2021 | October   | 5.51                             |
| 2021 | November  | 5.05                             |
| 2021 | December  | 3.76                             |
| 2022 | January   | 4.38                             |
| 2022 | February  | 4.69                             |
| 2022 | March     | 4.90                             |
| 2022 | April     | 6.60                             |
| 2022 | May       | 8.14                             |
| 2022 | June      | 7.70                             |
| 2022 | July      | 7.28                             |
| 2022 | August    | 8.81                             |

Source: U.S. Energy Information Administration, Henry Hub Natural Gas Spot Price (MHHNGSP), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/MHHNGSP>, July 18, August 25, and September 26, 2022.



**Figure E-1**

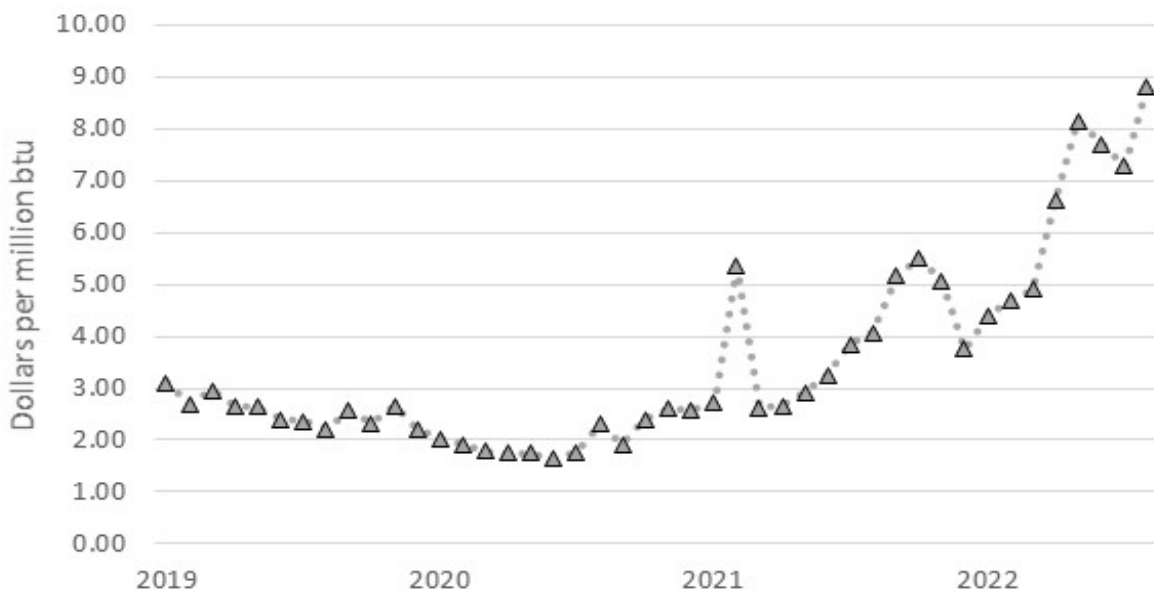
**Crude oil: Price in USD per barrel of WTI spot f.o.b. Cushing, OK, by month, January 2019-August 2022**



Source: U.S. Energy Information Administration, Crude Oil Prices: West Texas Intermediate (WTI) - Cushing, Oklahoma (MCOILWTICO), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/MCOILWTICO>, July 18, August 25, and September 26, 2022.

**Table E-2**

**Natural gas: Price in USD per million Btu of natural gas (Henry Hub spot price), by month, January 2019-August 2022**



Source: U.S. Energy Information Administration, Henry Hub Natural Gas Spot Price (MHHNGSP), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/MHHNGSP>, July 18, August 25, and September 26, 2022.



**APPENDIX F**

**FIRM-BY-FIRM PRODUCTION AND PROCESSING**

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**Table F-1**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| <b>Production type</b>              | <b>Measure</b>    | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------------------|-------------------|-------------|-------------|-------------|---------------------|---------------------|
| Mill production                     | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Domestic processing                 | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Processing of imports               | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| All production and processing types | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Mill production                     | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| Domestic processing                 | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| Processing of imports               | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| All production and processing types | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-2**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| <b>Production type</b>              | <b>Measure</b>    | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------------------|-------------------|-------------|-------------|-------------|---------------------|---------------------|
| Mill production                     | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Domestic processing                 | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Processing of imports               | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| All production and processing types | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Mill production                     | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| Domestic processing                 | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| Processing of imports               | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| All production and processing types | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-3**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-4**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-5**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-6**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-7**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-8**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.



**Table F-9**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-10**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-11**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-12**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-13**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-14**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-15**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-16**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-17**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-18**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| Production type                     | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------------|-------------------|------|------|------|--------------|--------------|
| Mill production                     | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Mill production                     | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Domestic processing                 | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Processing of imports               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All production and processing types | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Table F-19**  
**OCTG: U.S. producer \*\*\*'s U.S. production and processing, by type and period**

Quantity in short tons; Shares in percent

| <b>Production type</b>              | <b>Measure</b>    | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------------------|-------------------|-------------|-------------|-------------|---------------------|---------------------|
| Mill production                     | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Domestic processing                 | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Processing of imports               | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| All production and processing types | Quantity          | ***         | ***         | ***         | ***                 | ***                 |
| Mill production                     | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| Domestic processing                 | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| Processing of imports               | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |
| All production and processing types | Share of quantity | ***         | ***         | ***         | ***                 | ***                 |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**APPENDIX G**

**ADDITIONAL BREAKOUTS OF U.S. SHIPMENTS**

|  |      |
|--|------|
| Table G-1: OCTG: U.S. mills' U.S. shipments, by end finish and grade .....   | G-3  |
| Table G-2: OCTG: U.S. importers' U.S. shipments of imports from Argentina, by end finish and grade .....               | G-6  |
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**Table G-1**  
**OCTG: U.S. mills' U.S. shipments, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-1 Continued**  
**OCTG: U.S. mills' U.S. shipments, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-1 Continued**  
**OCTG: U.S. mills' U.S. shipments, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-2****OCTG: U.S. importers' U.S. shipments of imports from Argentina, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-2 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from Argentina, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-2 Continued**  
**OCTG: U.S. importers' U.S. shipments of imports from Argentina, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-3****OCTG: U.S. importers' U.S. shipments of imports from Mexico, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-3 Continued**  
**OCTG: U.S. importers' U.S. shipments of imports from Mexico, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.



**Table G-3 Continued**  
**OCTG: U.S. importers' U.S. shipments of imports from Mexico, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-4****OCTG: U.S. importers' U.S. shipments of imports from Russia, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-4 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from Russia, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-4 Continued**  
**OCTG: U.S. importers' U.S. shipments of imports from Russia, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-5****OCTG: U.S. importers' U.S. shipments of imports from South Korea, subject, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-5 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from South Korea, subject, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-5 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from South Korea, subject, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-6****OCTG: U.S. importers' U.S. shipments of imports from subject sources, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.



**Table G-6 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from subject sources, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-6 Continued**  
**OCTG: U.S. importers' U.S. shipments of imports from subject sources, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-7****OCTG: U.S. importers' U.S. shipments of imports from South Korea, nonsubject, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-7 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from South Korea, nonsubject, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-7 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from South Korea, nonsubject, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-8****OCTG: U.S. importers' U.S. shipments of imports from all other sources, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-8 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from all other sources, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-8 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from all other sources, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".



**Table G-9****OCTG: U.S. importers' U.S. shipments of imports from nonsubject sources, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-9 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from nonsubject sources, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-9 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from nonsubject sources, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-10****OCTG: U.S. importers' U.S. shipments of imports from all import sources, by end finish and grade**

Quantity in short tons; Value in 1,000 dollars

| Item                        | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------|------|------|------|--------------|--------------|
| Threaded J-55               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Value    | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Value    | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Value    | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Value    | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All other                   | Value    | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Value    | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Value    | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Value    | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-10 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from all import sources, by end finish and grade**

Unit value in dollars per short ton; Shares in percent

| Item                        | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|-------------------|------|------|------|--------------|--------------|
| Threaded J-55               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All other                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Threaded J-55               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of quantity | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table G-10 Continued**

**OCTG: U.S. importers' U.S. shipments of imports from all import sources, by end finish and grade**

Shares in percent

| Item                        | Measure        | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-----------------------------|----------------|------|------|------|--------------|--------------|
| Threaded J-55               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end J-55              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded L-80               | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end L-80              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded P-110              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end P-110             | Share of value | ***  | ***  | ***  | ***          | ***          |
| Threaded other              | Share of value | ***  | ***  | ***  | ***          | ***          |
| Plain end other             | Share of value | ***  | ***  | ***  | ***          | ***          |
| All J-55                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All L-80                    | Share of value | ***  | ***  | ***  | ***          | ***          |
| All P-110                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All other                   | Share of value | ***  | ***  | ***  | ***          | ***          |
| All threaded                | Share of value | ***  | ***  | ***  | ***          | ***          |
| All plain end               | Share of value | ***  | ***  | ***  | ***          | ***          |
| All end finishes and grades | Share of value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table G-11**  
**Seamless OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Quantity in short tons

| Source                  | Plain end | Threaded / coupled | All end finishes |
|-------------------------|-----------|--------------------|------------------|
| U.S. producers          | ***       | ***                | ***              |
| Argentina               | ***       | ***                | ***              |
| Mexico                  | ***       | ***                | ***              |
| Russia                  | ***       | ***                | ***              |
| South Korea, subject    | ***       | ***                | ***              |
| Subject sources         | ***       | ***                | ***              |
| South Korea, nonsubject | ***       | ***                | ***              |
| All other sources       | ***       | ***                | ***              |
| Nonsubject sources      | ***       | ***                | ***              |
| All import sources      | ***       | ***                | ***              |
| All sources             | ***       | ***                | ***              |

Table continued.

**Table G-11 Continued**  
**Seamless OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Shares across in percent

| Source                  | Plain end | Threaded / coupled | All end finishes |
|-------------------------|-----------|--------------------|------------------|
| U.S. producers          | ***       | ***                | ***              |
| Argentina               | ***       | ***                | ***              |
| Mexico                  | ***       | ***                | ***              |
| Russia                  | ***       | ***                | ***              |
| South Korea, subject    | ***       | ***                | ***              |
| Subject sources         | ***       | ***                | ***              |
| South Korea, nonsubject | ***       | ***                | ***              |
| All other sources       | ***       | ***                | ***              |
| Nonsubject sources      | ***       | ***                | ***              |
| All import sources      | ***       | ***                | ***              |
| All sources             | ***       | ***                | ***              |

Table continued.

**Table G-11 Continued**  
**Seamless OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Shares down in percent

| Source                  | Plain end | Threaded /<br>coupled | All end finishes |
|-------------------------|-----------|-----------------------|------------------|
| U.S. producers          | ***       | ***                   | ***              |
| Argentina               | ***       | ***                   | ***              |
| Mexico                  | ***       | ***                   | ***              |
| Russia                  | ***       | ***                   | ***              |
| South Korea, subject    | ***       | ***                   | ***              |
| Subject sources         | ***       | ***                   | ***              |
| South Korea, nonsubject | ***       | ***                   | ***              |
| All other sources       | ***       | ***                   | ***              |
| Nonsubject sources      | ***       | ***                   | ***              |
| All import sources      | ***       | ***                   | ***              |
| All sources             | ***       | ***                   | ***              |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

**Figure G-1**  
**Seamless OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.



**Table G-12**  
**Seamless OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Quantity in short tons

| Source                  | J-55 | L-80 | P-110 | All other grades | All grades |
|-------------------------|------|------|-------|------------------|------------|
| U.S. producers          | ***  | ***  | ***   | ***              | ***        |
| Argentina               | ***  | ***  | ***   | ***              | ***        |
| Mexico                  | ***  | ***  | ***   | ***              | ***        |
| Russia                  | ***  | ***  | ***   | ***              | ***        |
| South Korea, subject    | ***  | ***  | ***   | ***              | ***        |
| Subject sources         | ***  | ***  | ***   | ***              | ***        |
| South Korea, nonsubject | ***  | ***  | ***   | ***              | ***        |
| All other sources       | ***  | ***  | ***   | ***              | ***        |
| Nonsubject sources      | ***  | ***  | ***   | ***              | ***        |
| All import sources      | ***  | ***  | ***   | ***              | ***        |
| All sources             | ***  | ***  | ***   | ***              | ***        |

Table continued.

**Table G-12 Continued**  
**Seamless OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Shares across in percent

| Source                  | J-55 | L-80 | P-110 | All other grades | All grades |
|-------------------------|------|------|-------|------------------|------------|
| U.S. producers          | ***  | ***  | ***   | ***              | ***        |
| Argentina               | ***  | ***  | ***   | ***              | ***        |
| Mexico                  | ***  | ***  | ***   | ***              | ***        |
| Russia                  | ***  | ***  | ***   | ***              | ***        |
| South Korea, subject    | ***  | ***  | ***   | ***              | ***        |
| Subject sources         | ***  | ***  | ***   | ***              | ***        |
| South Korea, nonsubject | ***  | ***  | ***   | ***              | ***        |
| All other sources       | ***  | ***  | ***   | ***              | ***        |
| Nonsubject sources      | ***  | ***  | ***   | ***              | ***        |
| All import sources      | ***  | ***  | ***   | ***              | ***        |
| All sources             | ***  | ***  | ***   | ***              | ***        |

Table continued.

**Table G-12 Continued**  
**Seamless OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Shares down in percent

| Source                  | J-55 | L-80 | P-110 | All other grades | All grades |
|-------------------------|------|------|-------|------------------|------------|
| U.S. producers          | ***  | ***  | ***   | ***              | ***        |
| Argentina               | ***  | ***  | ***   | ***              | ***        |
| Mexico                  | ***  | ***  | ***   | ***              | ***        |
| Russia                  | ***  | ***  | ***   | ***              | ***        |
| South Korea, subject    | ***  | ***  | ***   | ***              | ***        |
| Subject sources         | ***  | ***  | ***   | ***              | ***        |
| South Korea, nonsubject | ***  | ***  | ***   | ***              | ***        |
| All other sources       | ***  | ***  | ***   | ***              | ***        |
| Nonsubject sources      | ***  | ***  | ***   | ***              | ***        |
| All import sources      | ***  | ***  | ***   | ***              | ***        |
| All sources             | ***  | ***  | ***   | ***              | ***        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure G-2**  
**Seamless OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

**Table G-13**  
**Welded OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Quantity in short tons

| Source                  | Plain end | Threaded / coupled | All end finishes |
|-------------------------|-----------|--------------------|------------------|
| U.S. producers          | ***       | ***                | ***              |
| Argentina               | ***       | ***                | ***              |
| Mexico                  | ***       | ***                | ***              |
| Russia                  | ***       | ***                | ***              |
| South Korea, subject    | ***       | ***                | ***              |
| Subject sources         | ***       | ***                | ***              |
| South Korea, nonsubject | ***       | ***                | ***              |
| All other sources       | ***       | ***                | ***              |
| Nonsubject sources      | ***       | ***                | ***              |
| All import sources      | ***       | ***                | ***              |
| All sources             | ***       | ***                | ***              |

Table continued.

**Table G-13 Continued**  
**Welded OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Shares across in percent

| Source                  | Plain end | Threaded / coupled | All end finishes |
|-------------------------|-----------|--------------------|------------------|
| U.S. producers          | ***       | ***                | ***              |
| Argentina               | ***       | ***                | ***              |
| Mexico                  | ***       | ***                | ***              |
| Russia                  | ***       | ***                | ***              |
| South Korea, subject    | ***       | ***                | ***              |
| Subject sources         | ***       | ***                | ***              |
| South Korea, nonsubject | ***       | ***                | ***              |
| All other sources       | ***       | ***                | ***              |
| Nonsubject sources      | ***       | ***                | ***              |
| All import sources      | ***       | ***                | ***              |
| All sources             | ***       | ***                | ***              |

Table continued.

**Table G-13 Continued**  
**Welded OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

Shares down in percent

| Source                  | Plain end | Threaded / coupled | All end finishes |
|-------------------------|-----------|--------------------|------------------|
| U.S. producers          | ***       | ***                | ***              |
| Argentina               | ***       | ***                | ***              |
| Mexico                  | ***       | ***                | ***              |
| Russia                  | ***       | ***                | ***              |
| South Korea, subject    | ***       | ***                | ***              |
| Subject sources         | ***       | ***                | ***              |
| South Korea, nonsubject | ***       | ***                | ***              |
| All other sources       | ***       | ***                | ***              |
| Nonsubject sources      | ***       | ***                | ***              |
| All import sources      | ***       | ***                | ***              |
| All sources             | ***       | ***                | ***              |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

**Figure G-3**  
**Welded OCTG: U.S. mills' and U.S. importers' U.S. shipments, by end finish, 2021**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

**Table G-14**  
**Welded OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Quantity in short tons

| Source                  | J-55 | L-80 | P-110 | All other grades | All grades |
|-------------------------|------|------|-------|------------------|------------|
| U.S. producers          | ***  | ***  | ***   | ***              | ***        |
| Argentina               | ***  | ***  | ***   | ***              | ***        |
| Mexico                  | ***  | ***  | ***   | ***              | ***        |
| Russia                  | ***  | ***  | ***   | ***              | ***        |
| South Korea, subject    | ***  | ***  | ***   | ***              | ***        |
| Subject sources         | ***  | ***  | ***   | ***              | ***        |
| South Korea, nonsubject | ***  | ***  | ***   | ***              | ***        |
| All other sources       | ***  | ***  | ***   | ***              | ***        |
| Nonsubject sources      | ***  | ***  | ***   | ***              | ***        |
| All import sources      | ***  | ***  | ***   | ***              | ***        |
| All sources             | ***  | ***  | ***   | ***              | ***        |

Table continued.

**Table G-14 Continued**  
**Welded OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Shares across in percent

| Source                  | J-55 | L-80 | P-110 | All other grades | All grades |
|-------------------------|------|------|-------|------------------|------------|
| U.S. producers          | ***  | ***  | ***   | ***              | ***        |
| Argentina               | ***  | ***  | ***   | ***              | ***        |
| Mexico                  | ***  | ***  | ***   | ***              | ***        |
| Russia                  | ***  | ***  | ***   | ***              | ***        |
| South Korea, subject    | ***  | ***  | ***   | ***              | ***        |
| Subject sources         | ***  | ***  | ***   | ***              | ***        |
| South Korea, nonsubject | ***  | ***  | ***   | ***              | ***        |
| All other sources       | ***  | ***  | ***   | ***              | ***        |
| Nonsubject sources      | ***  | ***  | ***   | ***              | ***        |
| All import sources      | ***  | ***  | ***   | ***              | ***        |
| All sources             | ***  | ***  | ***   | ***              | ***        |

Table continued.

**Table G-14 Continued**  
**Welded OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

Shares down in percent

| Source                  | J-55 | L-80 | P-110 | All other grades | All grades |
|-------------------------|------|------|-------|------------------|------------|
| U.S. producers          | ***  | ***  | ***   | ***              | ***        |
| Argentina               | ***  | ***  | ***   | ***              | ***        |
| Mexico                  | ***  | ***  | ***   | ***              | ***        |
| Russia                  | ***  | ***  | ***   | ***              | ***        |
| South Korea, subject    | ***  | ***  | ***   | ***              | ***        |
| Subject sources         | ***  | ***  | ***   | ***              | ***        |
| South Korea, nonsubject | ***  | ***  | ***   | ***              | ***        |
| All other sources       | ***  | ***  | ***   | ***              | ***        |
| Nonsubject sources      | ***  | ***  | ***   | ***              | ***        |
| All import sources      | ***  | ***  | ***   | ***              | ***        |
| All sources             | ***  | ***  | ***   | ***              | ***        |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure G-4**  
**Welded OCTG: U.S. mills' and U.S. importers' U.S. shipments, by grade, 2021**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

**APPENDIX H**

**TRADE DATA EXCLUDING U.S. PRODUCER \*\*\***

|   |      |
|---|------|
| Table H-1: OCTG: U.S. mills' capacity, production, and capacity utilization excluding U.S. producer ***, by period .....  | H-3  |
| Table H-2: OCTG: U.S. processors' capacity, production, and capacity utilization excluding U.S. producer ***, by period .....   | H-3  |
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**Table H-1**

**OCTG: U.S. mills' capacity, production, and capacity utilization excluding U.S. producer \*\*\*, by period**

Quantity in short tons; Ratio in percent

| Item                 | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------|----------|------|------|------|--------------|--------------|
| Capacity             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Production           | Quantity | ***  | ***  | ***  | ***          | ***          |
| Capacity utilization | Ratio    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table H-2**

**OCTG: U.S. processors' capacity, production, and capacity utilization excluding U.S. producer \*\*\*, by period**

Quantity in short tons; Ratio in percent

| Item                 | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------|----------|------|------|------|--------------|--------------|
| Capacity             | Quantity | ***  | ***  | ***  | ***          | ***          |
| Production           | Quantity | ***  | ***  | ***  | ***          | ***          |
| Capacity utilization | Ratio    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table H-3**  
**OCTG: U.S. mills' shipments excluding U.S. producer \*\*\*, by location of shipment and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

| Item             | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------|-------------------|------|------|------|--------------|--------------|
| U.S. shipments   | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Export shipments | Quantity          | ***  | ***  | ***  | ***          | ***          |
| Total shipments  | Quantity          | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments   | Value             | ***  | ***  | ***  | ***          | ***          |
| Export shipments | Value             | ***  | ***  | ***  | ***          | ***          |
| Total shipments  | Value             | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Export shipments | Unit value        | ***  | ***  | ***  | ***          | ***          |
| Total shipments  | Unit value        | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Export shipments | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| Total shipments  | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments   | Share of value    | ***  | ***  | ***  | ***          | ***          |
| Export shipments | Share of value    | ***  | ***  | ***  | ***          | ***          |
| Total shipments  | Share of value    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table H-4**

**OCTG: U.S. toll processors' U.S. shipments excluding U.S. producer \*\*\*, by shipment type and period**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Shares in percent

| Item                             | Measure           | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------------|-------------------|------|------|------|--------------|--------------|
| For U.S. mills                   | Quantity          | ***  | ***  | ***  | ***          | ***          |
| For U.S. importers               | Quantity          | ***  | ***  | ***  | ***          | ***          |
| For other customers              | Quantity          | ***  | ***  | ***  | ***          | ***          |
| All shipments returned to tollee | Quantity          | ***  | ***  | ***  | ***          | ***          |
| For U.S. mills                   | Value             | ***  | ***  | ***  | ***          | ***          |
| For U.S. importers               | Value             | ***  | ***  | ***  | ***          | ***          |
| For other customers              | Value             | ***  | ***  | ***  | ***          | ***          |
| All shipments returned to tollee | Value             | ***  | ***  | ***  | ***          | ***          |
| For U.S. mills                   | Unit value        | ***  | ***  | ***  | ***          | ***          |
| For U.S. importers               | Unit value        | ***  | ***  | ***  | ***          | ***          |
| For other customers              | Unit value        | ***  | ***  | ***  | ***          | ***          |
| All shipments returned to tollee | Unit value        | ***  | ***  | ***  | ***          | ***          |
| For U.S. mills                   | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| For U.S. importers               | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| For other customers              | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| All shipments returned to tollee | Share of quantity | ***  | ***  | ***  | ***          | ***          |
| For U.S. mills                   | Share of value    | ***  | ***  | ***  | ***          | ***          |
| For U.S. importers               | Share of value    | ***  | ***  | ***  | ***          | ***          |
| For other customers              | Share of value    | ***  | ***  | ***  | ***          | ***          |
| All shipments returned to tollee | Share of value    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table H-5****OCTG: U.S. producers' U.S. shipments for use in apparent U.S. consumption excluding U.S. producer \*\*\*, by period**

Quantity in short tons; Value in 1,000 dollars

| Item                                   | Measure  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|--|----------|------|------|------|--------------|--------------|
| U.S. shipments                         | Quantity | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments mills only              | Value    | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments value added to domestic | Value    | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments fully domestic          | Value    | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments value added to imports  | Value    | ***  | ***  | ***  | ***          | ***          |
| U.S. shipments total                   | Value    | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Quantity for U.S. producers' U.S. shipments reflects mill's U.S. shipment quantities. Value for U.S. producers' U.S. shipments reflects OCTG products sold in the United States from domestically manufactured OCTG (including the incremental value from U.S. non-toll processors' heat treatment of domestic OCTG), as well as the incremental value from U.S. processors' heat treatment of imported OCTG. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table H-6****OCTG: U.S. mills' inventories and inventory ratios excluding U.S. producer \*\*\*, by period**

Quantity in short tons; Inventory ratios in percent

| Item                               | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|------------------------------------|------|------|------|--------------|--------------|
| End-of-period inventory quantity   | ***  | ***  | ***  | ***          | ***          |
| Inventory ratio to U.S. production | ***  | ***  | ***  | ***          | ***          |
| Inventory ratio to U.S. shipments  | ***  | ***  | ***  | ***          | ***          |
| Inventory ratio to total shipments | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table H-7****OCTG: U.S. producers' combined employment related data excluding U.S. producer \*\*\*, by period**

Quantity in short tons; Inventory ratios in percent

| Item  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|------|------|------|--------------|--------------|
| Production and related workers (PRWs) (number)        | ***  | ***  | ***  | ***          | ***          |
| Total hours worked (1,000 hours)                      | ***  | ***  | ***  | ***          | ***          |
| Hours worked per PRW (hours)                          | ***  | ***  | ***  | ***          | ***          |
| Wages paid (\$1,000)                                  | ***  | ***  | ***  | ***          | ***          |
| Hourly wages (dollars per hour)                       | ***  | ***  | ***  | ***          | ***          |
| Mills: Productivity (short tons per 1,000 hours)      | ***  | ***  | ***  | ***          | ***          |
| Mills: Unit labor costs (dollars per short ton)       | ***  | ***  | ***  | ***          | ***          |
| Processors: Productivity (short tons per 1,000 hours) | ***  | ***  | ***  | ***          | ***          |
| Processors: Unit labor costs (dollars per short ton)  | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

**Table H-8****OCTG: Apparent U.S. consumption and market shares excluding U.S. producer \*\*\* based on quantity data, by source and period**

Quantity in short tons

| <b>Source</b>           | <b>Measure</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|----------------|-------------|-------------|-------------|---------------------|---------------------|
| Included U.S. producers | Quantity       | ***         | ***         | ***         | ***                 | ***                 |
| Excluded U.S. producers | Quantity       | ***         | ***         | ***         | ***                 | ***                 |
| All U.S. producers      | Quantity       | 2,983,013   | 1,601,197   | 1,697,888   | 719,001             | 1,241,472           |
| Argentina               | Quantity       | 162,875     | 16,735      | 162,640     | 81,015              | 59,593              |
| Mexico                  | Quantity       | 214,197     | 164,874     | 344,432     | 127,777             | 132,755             |
| Russia                  | Quantity       | 215,339     | 49,340      | 148,084     | 58,081              | 81,321              |
| South Korea, subject    | Quantity       | ***         | ***         | ***         | ***                 | ***                 |
| Subject sources         | Quantity       | ***         | ***         | ***         | ***                 | ***                 |
| South Korea, nonsubject | Quantity       | ***         | ***         | ***         | ***                 | ***                 |
| All other sources       | Quantity       | 1,238,082   | 517,438     | 644,483     | 217,784             | 633,608             |
| Nonsubject sources      | Quantity       | ***         | ***         | ***         | ***                 | ***                 |
| All import sources      | Quantity       | 2,280,575   | 1,049,735   | 1,806,970   | 702,322             | 1,183,285           |
| All sources             | Quantity       | 5,263,588   | 2,650,932   | 3,504,858   | 1,421,323           | 2,424,757           |

Table continued.

**Table H-8 Continued**

**OCTG: Apparent U.S. consumption and market shares excluding U.S. producer \*\*\* based on quantity data, by source and period**

Shares in percent

| Source                  | Measure | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|---------|-------|-------|-------|--------------|--------------|
| Included U.S. producers | Share   | ***   | ***   | ***   | ***          | ***          |
| Excluded U.S. producers | Share   | ***   | ***   | ***   | ***          | ***          |
| All U.S. producers      | Share   | 56.7  | 60.4  | 48.4  | 50.6         | 51.2         |
| Argentina               | Share   | 3.1   | 0.6   | 4.6   | 5.7          | 2.5          |
| Mexico                  | Share   | 4.1   | 6.2   | 9.8   | 9.0          | 5.5          |
| Russia                  | Share   | 4.1   | 1.9   | 4.2   | 4.1          | 3.4          |
| South Korea, subject    | Share   | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Share   | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Share   | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Share   | 23.5  | 19.5  | 18.4  | 15.3         | 26.1         |
| Nonsubject sources      | Share   | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Share   | 43.3  | 39.6  | 51.6  | 49.4         | 48.8         |
| All sources             | Share   | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series.

Note: Quantity for U.S. producers' U.S. shipments reflects mill's U.S. shipment quantities. Value for U.S. producers' U.S. shipments reflects OCTG products sold in the United States from domestically manufactured OCTG (including the incremental value from U.S. non-toll processors' heat treatment of domestic OCTG), as well as the incremental value from U.S. processors' heat treatment of imported OCTG. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import.

**Table H-9****OCTG: Apparent U.S. consumption and market shares excluding U.S. producer \*\*\* based on value data, by source and period**

Value in 1,000 dollars

| <b>Source</b>           | <b>Measure</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>Jan-Jun 2021</b> | <b>Jan-Jun 2022</b> |
|-------------------------|----------------|-------------|-------------|-------------|---------------------|---------------------|
| Included U.S. producers | Value          | ***         | ***         | ***         | ***                 | ***                 |
| Excluded U.S. producers | Value          | ***         | ***         | ***         | ***                 | ***                 |
| All U.S. producers      | Value          | 4,498,014   | 2,074,481   | 2,885,827   | 1,066,351           | 3,063,578           |
| Argentina               | Value          | 216,803     | 20,331      | 205,993     | 79,842              | 110,312             |
| Mexico                  | Value          | 350,408     | 222,982     | 488,307     | 153,250             | 273,771             |
| Russia                  | Value          | 230,773     | 40,376      | 143,613     | 42,669              | 103,597             |
| South Korea, subject    | Value          | ***         | ***         | ***         | ***                 | ***                 |
| Subject sources         | Value          | ***         | ***         | ***         | ***                 | ***                 |
| South Korea, nonsubject | Value          | ***         | ***         | ***         | ***                 | ***                 |
| All other sources       | Value          | 1,442,969   | 555,561     | 843,183     | 262,873             | 1,083,098           |
| Nonsubject sources      | Value          | ***         | ***         | ***         | ***                 | ***                 |
| All import sources      | Value          | 2,639,123   | 1,048,596   | 2,231,540   | 716,783             | 2,020,588           |
| All sources             | Value          | 7,137,137   | 3,123,077   | 5,117,367   | 1,783,134           | 5,084,166           |

Table continued.



**Table H-9 Continued**

**OCTG: Apparent U.S. consumption and market shares excluding U.S. producer \*\*\* based on value data, by source and period**

Shares in percent

| Source                  | Measure | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|---------|-------|-------|-------|--------------|--------------|
| Included U.S. producers | Share   | ***   | ***   | ***   | ***          | ***          |
| Excluded U.S. producers | Share   | ***   | ***   | ***   | ***          | ***          |
| All U.S. producers      | Share   | 63.0  | 66.4  | 56.4  | 59.8         | 60.3         |
| Argentina               | Share   | 3.0   | 0.7   | 4.0   | 4.5          | 2.2          |
| Mexico                  | Share   | 4.9   | 7.1   | 9.5   | 8.6          | 5.4          |
| Russia                  | Share   | 3.2   | 1.3   | 2.8   | 2.4          | 2.0          |
| South Korea, subject    | Share   | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Share   | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Share   | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Share   | 20.2  | 17.8  | 16.5  | 14.7         | 21.3         |
| Nonsubject sources      | Share   | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Share   | 37.0  | 33.6  | 43.6  | 40.2         | 39.7         |
| All sources             | Share   | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports values are based on the landed duty paid value.

Note: Quantity for U.S. producers' U.S. shipments reflects mill's U.S. shipment quantities. Value for U.S. producers' U.S. shipments reflects OCTG products sold in the United States from domestically manufactured OCTG (including the incremental value from U.S. non-toll processors' heat treatment of domestic OCTG), as well as the incremental value from U.S. processors' heat treatment of imported OCTG. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import.

**Table H-10**

**OCTG: Movements of OCTG and shares reflecting U.S. importers' inventory changes excluding U.S. producer \*\*\* based on quantity data, by source and period**

Quantity in short tons

| Source                  | Measure  | 2019      | 2020      | 2021      | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|----------|-----------|-----------|-----------|--------------|--------------|
| Included U.S. producers | Quantity | ***       | ***       | ***       | ***          | ***          |
| Excluded U.S. producers | Quantity | ***       | ***       | ***       | ***          | ***          |
| All U.S. producers      | Quantity | 2,983,013 | 1,601,197 | 1,697,888 | 719,001      | 1,241,472    |
| Argentina               | Quantity | ***       | ***       | ***       | ***          | ***          |
| Mexico                  | Quantity | ***       | ***       | ***       | ***          | ***          |
| Russia                  | Quantity | ***       | ***       | ***       | ***          | ***          |
| South Korea, subject    | Quantity | ***       | ***       | ***       | ***          | ***          |
| Subject sources         | Quantity | ***       | ***       | ***       | ***          | ***          |
| South Korea, nonsubject | Quantity | ***       | ***       | ***       | ***          | ***          |
| All other sources       | Quantity | ***       | ***       | ***       | ***          | ***          |
| Nonsubject sources      | Quantity | ***       | ***       | ***       | ***          | ***          |
| All import sources      | Quantity | ***       | ***       | ***       | ***          | ***          |
| All sources             | Quantity | ***       | ***       | ***       | ***          | ***          |

Table continued.

**Table H-10**

**OCTG: Movements of OCTG and shares reflecting U.S. importers' inventory changes excluding U.S. producer \*\*\* based on quantity data, by source and period**

Shares in percent

| Source                  | Measure | 2019  | 2020  | 2021  | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------|---------|-------|-------|-------|--------------|--------------|
| Included U.S. producers | Share   | ***   | ***   | ***   | ***          | ***          |
| Excluded U.S. producers | Share   | ***   | ***   | ***   | ***          | ***          |
| All U.S. producers      | Share   | ***   | ***   | ***   | ***          | ***          |
| Argentina               | Share   | ***   | ***   | ***   | ***          | ***          |
| Mexico                  | Share   | ***   | ***   | ***   | ***          | ***          |
| Russia                  | Share   | ***   | ***   | ***   | ***          | ***          |
| South Korea, subject    | Share   | ***   | ***   | ***   | ***          | ***          |
| Subject sources         | Share   | ***   | ***   | ***   | ***          | ***          |
| South Korea, nonsubject | Share   | ***   | ***   | ***   | ***          | ***          |
| All other sources       | Share   | ***   | ***   | ***   | ***          | ***          |
| Nonsubject sources      | Share   | ***   | ***   | ***   | ***          | ***          |
| All import sources      | Share   | ***   | ***   | ***   | ***          | ***          |
| All sources             | Share   | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7304.29.1010, 7304.29.1020, 7304.29.1030, 7304.29.1040, 7304.29.1050, 7304.29.1060, 7304.29.1080, 7304.29.2010, 7304.29.2020, 7304.29.2030, 7304.29.2040, 7304.29.2050, 7304.29.2060, 7304.29.2080, 7304.29.3110, 7304.29.3120, 7304.29.3130, 7304.29.3140, 7304.29.3150, 7304.29.3160, 7304.29.3180, 7304.29.4110, 7304.29.4120, 7304.29.4130, 7304.29.4140, 7304.29.4150, 7304.29.4160, 7304.29.4180, 7304.29.5015, 7304.29.5030, 7304.29.5045, 7304.29.5060, 7304.29.5075, 7304.29.6115, 7304.29.6130, 7304.29.6145, 7304.29.6160, 7304.29.6175, 7305.20.2000, 7305.20.4000, 7305.20.6000, 7305.20.8000, 7306.29.1030, 7306.29.1090, 7306.29.2000, 7306.29.3100, 7306.29.4100, 7306.29.6010, 7306.29.6050, 7306.29.8110, and 7306.29.8150, accessed August 9, 2022. Imports are based on the imports for consumption data series, with adjustments to reflect the inventory changes presented in table IV-23. Quantity for U.S. producers' U.S. shipments reflects mills' U.S. shipment quantities.



**APPENDIX J**

**PRICE DATA FOR HYUNDAI STEEL'S NONSUBJECT OCTG**



\*\*\* provided pricing data for OCTG produced by South Korean producer Hyundai Steel, which is a nonsubject producer of OCTG, presented below in tables J-1 to J-3. Table J-4 compares nonsubject prices with U.S. and subject prices. U.S. prices were lower than nonsubject prices in 12 quarters (\*\*\* short tons) and higher in 8 quarters (\*\*\* short tons).

**Table J-1**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product \*\*\*, by source and quarter**

Price in dollars per short ton, quantity in short tons.

| Period  | US price | US quantity | South Korea nonsubject price | South Korea nonsubject quantity |
|---------|----------|-------------|------------------------------|---------------------------------|
| 2019 Q1 | ***      | ***         | ***                          | ***                             |
| 2019 Q2 | ***      | ***         | ***                          | ***                             |
| 2019 Q3 | ***      | ***         | ***                          | ***                             |
| 2019 Q4 | ***      | ***         | ***                          | ***                             |
| 2020 Q1 | ***      | ***         | ***                          | ***                             |
| 2020 Q2 | ***      | ***         | ***                          | ***                             |
| 2020 Q3 | ***      | ***         | ***                          | ***                             |
| 2020 Q4 | ***      | ***         | ***                          | ***                             |
| 2021 Q1 | ***      | ***         | ***                          | ***                             |
| 2021 Q2 | ***      | ***         | ***                          | ***                             |
| 2021 Q3 | ***      | ***         | ***                          | ***                             |
| 2021 Q4 | ***      | ***         | ***                          | ***                             |
| 2022 Q1 | ***      | ***         | ***                          | ***                             |
| 2022 Q2 | ***      | ***         | ***                          | ***                             |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product \*\*\*.

**Table J-2**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product \*\*\*, by source and quarter**

Price in dollars per short ton, quantity in short tons.

| <b>Period</b> | <b>US price</b> | <b>US quantity</b> | <b>South Korea nonsubject price</b> | <b>South Korea nonsubject quantity</b> |
|---------------|-----------------|--------------------|-------------------------------------|--|
| 2019 Q1       | ***             | ***                | ***                                 | ***                                    |
| 2019 Q2       | ***             | ***                | ***                                 | ***                                    |
| 2019 Q3       | ***             | ***                | ***                                 | ***                                    |
| 2019 Q4       | ***             | ***                | ***                                 | ***                                    |
| 2020 Q1       | ***             | ***                | ***                                 | ***                                    |
| 2020 Q2       | ***             | ***                | ***                                 | ***                                    |
| 2020 Q3       | ***             | ***                | ***                                 | ***                                    |
| 2020 Q4       | ***             | ***                | ***                                 | ***                                    |
| 2021 Q1       | ***             | ***                | ***                                 | ***                                    |
| 2021 Q2       | ***             | ***                | ***                                 | ***                                    |
| 2021 Q3       | ***             | ***                | ***                                 | ***                                    |
| 2021 Q4       | ***             | ***                | ***                                 | ***                                    |
| 2022 Q1       | ***             | ***                | ***                                 | ***                                    |
| 2022 Q2       | ***             | ***                | ***                                 | ***                                    |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product \*\*\*.



**Table J-3**  
**OCTG: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product \*\*\*, by source and quarter**

Price in dollars per short ton, quantity in short tons.

| Period  | US price | US quantity | South Korea nonsubject price | South Korea nonsubject quantity |
|---------|----------|-------------|------------------------------|---------------------------------|
| 2019 Q1 | ***      | ***         | ***                          | ***                             |
| 2019 Q2 | ***      | ***         | ***                          | ***                             |
| 2019 Q3 | ***      | ***         | ***                          | ***                             |
| 2019 Q4 | ***      | ***         | ***                          | ***                             |
| 2020 Q1 | ***      | ***         | ***                          | ***                             |
| 2020 Q2 | ***      | ***         | ***                          | ***                             |
| 2020 Q3 | ***      | ***         | ***                          | ***                             |
| 2020 Q4 | ***      | ***         | ***                          | ***                             |
| 2021 Q1 | ***      | ***         | ***                          | ***                             |
| 2021 Q2 | ***      | ***         | ***                          | ***                             |
| 2021 Q3 | ***      | ***         | ***                          | ***                             |
| 2021 Q4 | ***      | ***         | ***                          | ***                             |
| 2022 Q1 | ***      | ***         | ***                          | ***                             |
| 2022 Q2 | ***      | ***         | ***                          | ***                             |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product \*\*\*.

**Table J-4**  
**OCTG: Summary of higher/(lower) unit values for nonsubject price data, by source, January 2019 through June 2022**

Quantity in short tons

| Comparison source       | Benchmark source     | Number of quarters lower | Quantity lower | Number of quarters higher | Quantity higher |
|-------------------------|----------------------|--------------------------|----------------|---------------------------|-----------------|
| South Korea, nonsubject | United States        | 12                       | ***            | 8                         | ***             |
| South Korea, nonsubject | Argentina            | ***                      | ***            | ***                       | ***             |
| South Korea, nonsubject | Mexico               | ***                      | ***            | ***                       | ***             |
| South Korea, nonsubject | Russia               | ***                      | ***            | ***                       | ***             |
| South Korea, nonsubject | South Korea, subject | ***                      | ***            | ***                       | ***             |

Source: Compiled from data submitted in response to Commission questionnaires.



**APPENDIX K**

**FINANCIAL DATA EXCLUDING U.S. PRODUCER \*\*\***



**Table K-1****OCTG: Results of U.S. mills' and non-toll processing operations excluding one U.S. producer \*\*\*, by item and period**

Quantity in short tons; value in 1,000 dollars; ratios in percent

| Item                          | Measure     | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|-------------------------------|-------------|------|------|------|--------------|--------------|
| Total net sales               | Quantity    | ***  | ***  | ***  | ***          | ***          |
| Total net sales               | Value       | ***  | ***  | ***  | ***          | ***          |
| Raw material costs            | Value       | ***  | ***  | ***  | ***          | ***          |
| Cost of tolling services      | Value       | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs            | Value       | ***  | ***  | ***  | ***          | ***          |
| Energy costs                  | Value       | ***  | ***  | ***  | ***          | ***          |
| Other factory costs           | Value       | ***  | ***  | ***  | ***          | ***          |
| COGS                          | Value       | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)        | Value       | ***  | ***  | ***  | ***          | ***          |
| SG&A expenses                 | Value       | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss)    | Value       | ***  | ***  | ***  | ***          | ***          |
| Other expense / (income), net | Value       | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)          | Value       | ***  | ***  | ***  | ***          | ***          |
| Depreciation/amortization     | Value       | ***  | ***  | ***  | ***          | ***          |
| Cash flow                     | Value       | ***  | ***  | ***  | ***          | ***          |
| Raw material costs            | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs            | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Energy costs                  | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Other factory costs           | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| COGS                          | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Gross profit                  | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| SG&A expense                  | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss)    | Ratio to NS | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)          | Ratio to NS | ***  | ***  | ***  | ***          | ***          |

Table continued.

**Table K-1 Continued**  
**OCTG: Results of U.S. mills' and non-toll processing operations excluding one U.S. producer \*\*\*,**  
**by item and period**

Shares in percent; unit values in dollars per short ton

| Item                       | Measure    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|----------------------------|------------|------|------|------|--------------|--------------|
| Raw material costs         | Share      | ***  | ***  | ***  | ***          | ***          |
| Cost of tolling services   | Share      | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Share      | ***  | ***  | ***  | ***          | ***          |
| Energy costs               | Share      | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Share      | ***  | ***  | ***  | ***          | ***          |
| COGS                       | Share      | ***  | ***  | ***  | ***          | ***          |
| Total net sales            | Unit value | ***  | ***  | ***  | ***          | ***          |
| Raw material costs         | Unit value | ***  | ***  | ***  | ***          | ***          |
| Cost of tolling services   | Unit value | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs         | Unit value | ***  | ***  | ***  | ***          | ***          |
| Energy costs               | Unit value | ***  | ***  | ***  | ***          | ***          |
| Other factory costs        | Unit value | ***  | ***  | ***  | ***          | ***          |
| COGS                       | Unit value | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)     | Unit value | ***  | ***  | ***  | ***          | ***          |
| SG&A expenses              | Unit value | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss) | Unit value | ***  | ***  | ***  | ***          | ***          |
| Net income or (loss)       | Unit value | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COGS. The cost of tolling service is not shown as a ratio to NS or on a unit value basis. Tolling services were not used for the majority of OCTG net sales, therefore ratios and unit values based on total net sales are not meaningful.

**Table K-2****OCTG: Changes in AUVs between comparison periods for U.S. mills' and non-toll processing operations excluding one U.S. producer \*\*\***

Changes in percent

| Item                | 2019-21 | 2019-20 | 2020-21 | Jan-Jun 2021-22 |
|---------------------|---------|---------|---------|-----------------|
| Total net sales     | ***     | ***     | ***     | ***             |
| Raw material costs  | ***     | ***     | ***     | ***             |
| Direct labor costs  | ***     | ***     | ***     | ***             |
| Energy costs        | ***     | ***     | ***     | ***             |
| Other factory costs | ***     | ***     | ***     | ***             |
| COGS                | ***     | ***     | ***     | ***             |

Table continued.

**Table K-2 Continued****OCTG: Changes in AUVs between comparison periods for U.S. mills' and non-toll processing operations excluding one U.S. producer \*\*\***

Changes in dollars per short ton

| Item                       | 2019-21 | 2019-20 | 2020-21 | Jan-Jun 2021-22 |
|----------------------------|---------|---------|---------|-----------------|
| Total net sales            | ***     | ***     | ***     | ***             |
| Raw material costs         | ***     | ***     | ***     | ***             |
| Direct labor costs         | ***     | ***     | ***     | ***             |
| Energy costs               | ***     | ***     | ***     | ***             |
| Other factory costs        | ***     | ***     | ***     | ***             |
| COGS                       | ***     | ***     | ***     | ***             |
| Gross profit or (loss)     | ***     | ***     | ***     | ***             |
| SG&A expense               | ***     | ***     | ***     | ***             |
| Operating income or (loss) | ***     | ***     | ***     | ***             |
| Net income or (loss)       | ***     | ***     | ***     | ***             |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The cost of tolling service is not shown above. Tolling services were not used for the majority of OCTG net sales, therefore unit values based on total net sales are not meaningful.

**Table K-3**  
**OCTG: Results of U.S. toll processors excluding one U.S. producer \*\*\*, by item and period**

Quantity in short tons; value in 1,000 dollars; ratios in percent

| Item                                  | Measure                  | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---------------------------------------|--------------------------|------|------|------|--------------|--------------|
| Net tolling quantity                  | Quantity                 | ***  | ***  | ***  | ***          | ***          |
| Net tolling revenue                   | Value                    | ***  | ***  | ***  | ***          | ***          |
| Raw materials not supplied by tollee  | Value                    | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs                    | Value                    | ***  | ***  | ***  | ***          | ***          |
| Other factory costs                   | Value                    | ***  | ***  | ***  | ***          | ***          |
| Total cost of tolling services (COTS) | Value                    | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)                | Value                    | ***  | ***  | ***  | ***          | ***          |
| G&A expenses                          | Value                    | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss)            | Value                    | ***  | ***  | ***  | ***          | ***          |
| Raw materials not supplied by tollee  | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs                    | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Other factory costs                   | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| COTS                                  | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)                | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| G&A expenses                          | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss)            | Ratio to tolling revenue | ***  | ***  | ***  | ***          | ***          |

Table continued.



**Table K-3 Continued**  
**OCTG: Results of U.S. toll processors excluding one U.S. producer \*\*\*, by item and period**

Shares in percent; unit values in dollars per short ton

| Item                                 | Measure    | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|--------------------------------------|------------|------|------|------|--------------|--------------|
| Raw materials not supplied by tollee | Share      | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs                   | Share      | ***  | ***  | ***  | ***          | ***          |
| Other factory costs                  | Share      | ***  | ***  | ***  | ***          | ***          |
| Total cost of tolling services       | Share      | ***  | ***  | ***  | ***          | ***          |
| Net tolling revenue                  | Unit value | ***  | ***  | ***  | ***          | ***          |
| Raw materials not supplied by tollee | Unit value | ***  | ***  | ***  | ***          | ***          |
| Direct labor costs                   | Unit value | ***  | ***  | ***  | ***          | ***          |
| Other factory costs                  | Unit value | ***  | ***  | ***  | ***          | ***          |
| COTS                                 | Unit value | ***  | ***  | ***  | ***          | ***          |
| Gross profit or (loss)               | Unit value | ***  | ***  | ***  | ***          | ***          |
| G&A expenses                         | Unit value | ***  | ***  | ***  | ***          | ***          |
| Operating income or (loss)           | Unit value | ***  | ***  | ***  | ***          | ***          |
| Operating losses                     | Count      | ***  | ***  | ***  | ***          | ***          |
| Data                                 | Count      | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COTS.

**Table K-4****OCTG: Changes in AUVs between comparison periods for U.S. toll processors excluding one U.S. producer \*\*\***

Changes in percent

| Item                                 | 2019-21 | 2019-20 | 2020-21 | Jan-Jun<br>2021-22 |
|--------------------------------------|---------|---------|---------|--------------------|
| Net tolling revenue                  | ***     | ***     | ***     | ***                |
| Raw materials not supplied by tollee | ***     | ***     | ***     | ***                |
| Direct labor costs                   | ***     | ***     | ***     | ***                |
| Other factory costs                  | ***     | ***     | ***     | ***                |
| COTS                                 | ***     | ***     | ***     | ***                |

Table continued.

**Table K-4 Continued****OCTG: Changes in AUVs between comparison periods for U.S. toll processors excluding one U.S. producer \*\*\***

Changes in dollars per short ton

| Item                                 | 2019-21 | 2019-20 | 2020-21 | Jan-Jun<br>2021-22 |
|--------------------------------------|---------|---------|---------|--------------------|
| Net tolling revenue                  | ***     | ***     | ***     | ***                |
| Raw materials not supplied by tollee | ***     | ***     | ***     | ***                |
| Direct labor costs                   | ***     | ***     | ***     | ***                |
| Other factory costs                  | ***     | ***     | ***     | ***                |
| COTS                                 | ***     | ***     | ***     | ***                |
| Gross profit or (loss)               | ***     | ***     | ***     | ***                |
| G&A expenses                         | ***     | ***     | ***     | ***                |
| Operating income or (loss)           | ***     | ***     | ***     | ***                |

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Unit values shown as "0" or "(0)" represent non-zero values that are less than 0.50 or more than (0.50), respectively. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

