

EBSA/PUBLIC DISCLOSURE  
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November 3, 2009

***VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Top Hat Plan Exemption  
Employee Benefits Security Administration  
Room N-1513  
U. S. Department of Labor  
200 Constitution Avenue N.W.  
Washington, D.C. 20210

Re: Nabors Industries, Inc.  
515 W. Greens Rd., Suite 1200  
Houston, TX 77067-4531  
EIN: 93-0711613

Ladies and Gentlemen:

Pursuant to DOL Regulation § 2520.104-23(b)(1), you are hereby notified that Nabors Industries, Inc. has established the Nabors Industries, Inc. Executive Deferred Compensation Plan (the "Executive DCP"), primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees of Nabors Industries, Inc. and certain of its affiliates, including Nabors Corporate Services, Inc., Nabors Drilling USA, LP, Canrig Drilling Technology, LTD, Nabors Production Services, and Nabors International Management Limited, who are members of Nabors' controlled group of corporations and group of trades or businesses under common control within the meaning of Sections 414(b) and (c) of the Internal Revenue Code of 1986, as amended (collectively, the "Company"). The number of employees currently benefiting under the Executive DCP is twenty.

Further, for purposes of updating a previous statement submitted by Nabors Industries, Inc. in 1995 in accordance with 29 C.F.R.2520.104-23(b)(1) to the Department of Labor, you are hereby notified that the Company currently maintains one other plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees of the Company. That plan is the Nabors Industries, Inc. Deferred Compensation Plan (the "DCP"), which currently has sixty-six covered employees. Benefits respecting the Executive DCP and the DCP are payable solely from the general assets of the Company.

Copies of Executive DCP and the DCP plan documents will be provided upon request by the Secretary of Labor. In accordance with EBSA Advisory Opinion 2008-08A, the addition or

removal of individual participating employers other than Nabors Industries, Inc. may occur from time to time without the need to file an updated registration statement provided that Nabors Industries, Inc. continues to be an employer of employees covered by the Executive DCP and the DCP and continues to be an authorized person from whom the Secretary of Labor could request such documents.

Please contact the undersigned if you require any additional information.

Very truly yours,

**NABORS INDUSTRIES, INC.**

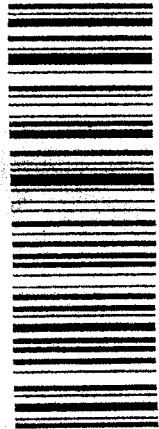
By: 

Norma Gilpatrick, SPHR

Chief Benefits Officer and  
Director of Payroll

cc: Ms. Dorene B. Cohen [Vinson & Elkins LLP]

**CERTIFIED MAIL**



7001 2510 0007 9463 575

Elkins & Elkins LLP Attorneys at Law  
City Tower, 1001 Fannin Street, Suite 2500

**Elkins**

# FIRST CLASS MAIL

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Washington, DC 20210

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