

**UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

GREENE'S ENERGY GROUP, LLC,  
Petitioner,

v.

OIL STATES ENERGY SERVICES, LLC,  
Patent Owner.

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Case IPR2014-00216

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**'053 Motion to Amend**

# Proposed Substitute Claim for Claim 1

An apparatus for securing a mandrel of a well tool in an operative position requiring fixed-point packoff above the casing of the well and within a tubing head spool of a [in the] wellhead assembly, the apparatus comprising:

a setting tool that is arranged to insert a bottom end of the mandrel through the wellhead, and is removable from the other portions of the apparatus;

a first and a second mechanical lockdown mechanism that are separate from the setting tool and arranged so that the mandrel is locked in the operative position only when both the first and the second mechanical lockdown mechanism are in respective lockdown positions;

the first mechanical lockdown mechanism adapted to detachably maintain the mandrel in proximity to the fixed-point packoff when in the lockdown position,

the first mechanical lockdown mechanism including a base member for connection to a wellhead of the well and a locking member for detachably engaging the base member; [and]

the second mechanical lockdown mechanism having a range of adjustment adequate to ensure that the mandrel can be moved into the operative position, and then locked down in the operative position without the use of hydraulic pressure while the first mechanical lockdown mechanism is in the lockdown position; and

the mandrel including a packoff assembly that seals against the fixed-point packoff within the tubing head spool.

# Proposed Substitute Claim for Claim 1

An apparatus for securing a mandrel of a well tool in an operative position requiring fixed-point packoff above the casing of the well and within a tubing head spool of a [in the] wellhead assembly, the apparatus comprising:

a setting tool that is arranged to insert a bottom end of the mandrel through the wellhead, and is removable from the other portions of the apparatus;

a first and a second mechanical lockdown mechanism that are separate from the setting tool and arranged so that the mandrel is locked in the operative position only when both the first and the second mechanical lockdown mechanism are in respective lockdown positions;

the first mechanical lockdown mechanism adapted to detachably maintain the mandrel in proximity to the fixed-point packoff when in the lockdown position,

the first mechanical lockdown mechanism including a base member for connection to a wellhead of the well and a locking member for detachably engaging the base member; [and]

the second mechanical lockdown mechanism having a range of adjustment adequate to ensure that the mandrel can be moved into the operative position, and then locked down in the operative position without the use of hydraulic pressure while the first mechanical lockdown mechanism is in the lockdown position; and

the mandrel including a packoff assembly that seals against the fixed-point packoff within the tubing head spool.

# Proposed Substitute Claim for Claim 1

An apparatus for securing a mandrel of a well tool in an operative position requiring fixed-point packoff above the casing of the well and within a tubing head spool of a [in the] wellhead assembly, the apparatus comprising:

a setting tool that is arranged to insert a bottom end of the mandrel through the wellhead, and is removable from the other portions of the apparatus;

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the first mechanical lockdown mechanism adapted to detachably maintain the mandrel in proximity to the fixed-point packoff when in the lockdown position,

the first mechanical lockdown mechanism including a base member for connection to a wellhead of the well and a locking member for detachably engaging the base member; [and]

the second mechanical lockdown mechanism having a range of adjustment adequate to ensure that the mandrel can be moved into the operative position, and then locked down in the operative position without the use of hydraulic pressure while the first mechanical lockdown mechanism is in the lockdown position; and

the mandrel including a packoff assembly that seals against the fixed-point packoff within the tubing head spool.

# Proposed Substitute Claim for Claim 1

An apparatus for securing a mandrel of a well tool in an operative position requiring fixed-point packoff above the casing of the well and within a tubing head spool of a [in the] wellhead assembly, the apparatus comprising:

a setting tool that is arranged to insert a bottom end of the mandrel through the wellhead, and is removable from the other portions of the apparatus;

a first and a second mechanical lockdown mechanism that are separate from the setting tool and arranged so that the mandrel is locked in the operative position only when both the first and the second mechanical lockdown mechanism are in respective lockdown positions;

the first mechanical lockdown mechanism adapted to detachably maintain the mandrel in proximity to the fixed-point packoff when in the lockdown position,

the first mechanical lockdown mechanism including a base member for connection to a wellhead of the well and a locking member for detachably engaging the base member; [and]

the second mechanical lockdown mechanism having a range of adjustment adequate to ensure that the mandrel can be moved into the operative position, and then locked down in the operative position without the use of hydraulic pressure while the first mechanical lockdown mechanism is in the lockdown position; and

the mandrel including a packoff assembly that seals against the fixed-point packoff within the tubing head spool.

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