

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attached.

Blank lines for listing applicable Internal Revenue Code sections and subsections.

18 Can any resulting loss be recognized? ▶ See attached.

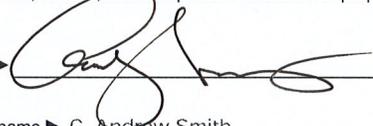
Blank lines for providing information regarding loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attached.

Blank lines for providing other information necessary to implement the adjustment.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶  Date ▶ 11 / 12 / 21
Print your name ▶ C. Andrew Smith Title ▶ Executive Vice President and CFO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶	Firm's EIN ▶			
	Firm's address ▶	Phone no.			

Attachment to Form 8937, Part II

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the "Code"), and includes a general summary regarding the application of certain US federal income tax laws and regulations related to the effects of the Transaction (as defined below) on the tax basis of shares of common stock of Patterson-UTI Energy, Inc. ("Patterson") received in exchange for shares of common stock of Pioneer Energy Services Corp. ("Pioneer"). The information contained herein does not constitute tax advice and does not purport to be complete or describe the tax consequences that may apply to particular categories of shareholders.

Neither Patterson nor Pioneer provides tax advice to its shareholders. Shareholders are encouraged to consult their own tax advisors regarding the particular consequences of the Transaction to them (including the applicability and effect of all US federal, state and local tax laws and non-US tax laws) and should carefully read the joint proxy statement/prospectus, which is part of a Registration Statement on Form S-4 that Patterson filed on August 3, 2021 with the Securities and Exchange Commission, noting especially the discussion under the heading "Material U.S. Federal Income Tax Consequences." The information provided herein is subject to such discussion in all respects. The Registration Statement may be accessed at www.sec.gov.

In connection with the Transaction, all of the outstanding notes issued by Pioneer were converted or redeemed. Any holder of such Pioneer notes is encouraged to consult the separate IRS Form 8937s posted by Patterson with respect to the debt conversion or redemption for information regarding the effect on the basis of such securities.

Line 14

On October 1, 2021, Patterson completed the acquisition of Pioneer pursuant to the Agreement and Plan of Merger among Patterson, Crescent Merger Sub Inc., a Delaware corporation and a wholly-owned subsidiary of Patterson ("Merger Sub Inc."), Crescent Ranch Second Merger Sub LLC, a Delaware limited liability company and a wholly-owned subsidiary of Patterson treated as a disregarded entity from its owner for federal income tax purposes ("Merger Sub LLC") and Pioneer dated July 5, 2021 (the "Merger Agreement"), through a double merger in which Merger Sub Inc. first merged with and into Pioneer (the first merger) with Pioneer as the survivor of the first merger, followed immediately by the merger (the second merger) of Pioneer with and into Merger Sub LLC with Merger Sub LLC as the survivor of the second merger. The first merger and the second merger were intended to be treated as integrated steps in an overall transaction (the "Transaction").

In the Transaction, each issued and outstanding share of Pioneer common stock ("Pioneer Shares") was exchanged for 1.8692 shares of Patterson common stock ("Patterson Shares"). Pursuant to the Merger Agreement, fractional shares were cancelled based on a value of \$9.44 per share, which is the closing sales price of one share of Patterson common stock as reported on the NASDAQ Global Select Market on October 1, 2021.

Line 15

The Transaction is intended to qualify as a reorganization under section 368(a) of the Code. Accordingly, a Pioneer shareholder who received Patterson Shares in exchange for Pioneer Shares in the Transaction generally will not recognize any gain or loss for US federal income tax purposes, except with respect to cash, if any, received in lieu of fractional shares of Patterson Common Stock.

Each such Pioneer shareholder's aggregate tax basis in the Patterson Shares received pursuant to the Transaction (including any fractional Patterson Shares for which cash was received) will equal such Pioneer shareholder's aggregate adjusted tax basis in the Pioneer Shares surrendered in the Transaction.

Each such Pioneer shareholder that received cash in lieu of fractional Patterson Shares generally will recognize capital gain or loss equal to the difference between the amount of cash received and the tax basis in such fractional share determined as described above.

Line 16

The aggregate tax basis of the Patterson Shares received in the Transaction (including any fractional Patterson Shares deemed received) will equal the aggregate adjusted tax basis in the shares of the Pioneer Shares exchanged.

Line 17

Sections 354, 358, 368, 1001 and 1223 of the Code

Line 18

Pioneer shareholders generally may not recognize any loss for US federal income tax purposes as a result of the Transaction, except with respect to cash, if any, received in lieu of fractional Patterson Shares.

Line 19

The Transaction was effective on October 1, 2021. For a Pioneer shareholder whose taxable year is the calendar year, the reportable tax year is 2021.