



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

November 2, 2022

Joseph Murphy
Compliance Manager
Hunting Titan
16825 Northchase Drive
Suite 600
Houston, TX 77060

Reference No. 22-0090

Dear Mr. Murphy:

This letter is in response to your September 2, 2022, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to § 172.102, special provision 114 (SP 114). Specifically, you ask questions regarding the explosive weight of shaped charges for jet perforating guns (JPGs).

We have paraphrased and answered your questions as follows:

- Q1. You ask whether the conditions outlined in SP 114(a) mean that only the explosive weight of the shape charges assembled in the JPGs count towards the 90.5 kg (200 pounds) limit per vehicle and not the other possible explosive components of a loaded JPG (e.g., a detonator cord or a booster).
- A1. The answer is yes. The 90.5 kg (200 pounds) limit per vehicle applies to the explosive weight of the shaped charges of the JPGs and does not include other explosive articles in the JPG such as a detonator cord or a booster.
- Q2. You ask whether the net explosive weight of other explosives shipped in accordance with § 177.848 on the same transport vehicle needs to be taken into consideration when transporting loaded JPGs that do not exceed the 90.5 kg (200 pounds) limit per vehicle.
- A2. The answer is no. Other explosives offered for transportation on the transport vehicle are not counted towards the 90.5 kg (200 pounds) limit per vehicle.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen". The signature is fluid and cursive, with a prominent initial "D".

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Baker

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)
Subject: FW: Letter of Interpretation Request
Date: Thursday, September 8, 2022 12:33:03 PM
Attachments: [Hunting Titan Letter of Interpretation Request - 09-02-2022.pdf](#)

22-0090

Dear Alice and team,
Please see the following LOI request. Let us know if any additional information is required. Thanks,
Rachel (HMIC)

From: Joe Murphy <Joe.Murphy@Hunting-intl.com>
Sent: Friday, September 2, 2022 12:52 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Letter of Interpretation Request

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To Whom it May Concern,

Please see attached letter of Interpretation request from Hunting Titan, Inc. in regards to Special Provision 114 as related to the transportation of loaded Jet Perforating Guns.

Respectfully,

Joseph Murphy - Compliance Manager / Distribution Center HSE
Hunting Titan, Inc.
16825 Northchase Dr. Suite 600
Houston, TX 77060
Office: 281-214-4500 Ext. 4477 Cell: 346-302-1607

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September 02, 2022

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave. SE
Washington, DC 20590

Hunting Titan
16825 Northchase Drive, Suite 600
Houston, TX 77060

Office 281-448-2200
Fax 281-448-2227
www.hunting-intl.com

Subject: Request of Letter of Interpretation

To whom it may concern,

Hunting Titan, Inc. respectfully request an interpretation of Special Provision 114 in 49CFR172.102.

SP 114 Jet perforating guns, charged, oil well, without detonator may be reclassified to Division 1.4 Compatibility Group D (1.4D) if the following conditions are met:

- a. The total weight of the explosive contents of the **shaped charges** assembled in the guns does not exceed 90.5 kg (200 pounds) per vehicle; and*
- b. The guns are packaged in accordance with Packing Method US 1 as specified in §173.62 of this subchapter.*

Specifically, in SP 114(a) it states that the total weight of the explosive content of the shaped charges assembled in the guns does not exceed 90.5 kg (200 pounds) per vehicle.

Question 1: Does the statement in SP 114(a) mean that only the explosive weight of the shape charges counts toward the 90.5 kg (200 pounds) per gun and not the other possible explosive components of a loaded jet perforating gun, such as detonator cord and a booster?

Question 2: When transporting loaded jet perforating guns that do not exceed 90.5 kg (200 pounds) per vehicle, do we need to take into consideration the net explosive weight of other explosives shipping on same vehicle (in this case the other explosives meet the segregation requirements per 49 CFR 177.848 and may transport on same vehicle).

Your consideration of this request is appreciated. Please let me know if additional information is needed. I may be contacted at 346-302-1607 or joe.murphy@hunting-intl.com.

Respectfully,

Joseph Murphy

Joseph Murphy
Compliance Manager, Hazardous Materials