November 06, 2023

1200 New Jersey Avenue, SE Washington, DC 20590



Pipeline and Hazardous Materials Safety Administration

### DOT-SP 20352 (FIFTH REVISION)

# EXPIRATION DATE: 2026-08-31

### (FOR RENEWAL, SEE 49 CFR 107.109)

1. <u>GRANTEE</u>: Schlumberger Technology Corp. Rosharon, TX

### 2. <u>PURPOSE AND LIMITATIONS</u>:

a. This special permit authorizes the manufacture, mark, sale, and use of non-DOT specification steel cylinders conforming to all the regulations applicable to a 3A DOT specification cylinder except as specified herein, for the transportation in commerce of the hazardous materials authorized by this special permit. This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.

b. The safety analyses performed in development of this special permit only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use, use as a component of a transport vehicle or other device, or other uses not associated with transportation in commerce.

c. In accordance with 49 CFR 107.107(a), party status may not be granted to a manufacturing special permit. These packagings may be used in accordance with 49 CFR 173.22a.

- 3. <u>REGULATORY SYSTEM AFFECTED</u>: 49 CFR Parts 106, 107 and 171-180.
- 4. <u>REGULATIONS FROM WHICH EXEMPTED</u>: 49 CFR 173.301(f) in that the cylinder is not fitted with a pressure relief device; §§ 173.302(a), 173.304(a), and 173.304(d) in that a non-DOT specification cylinder is not authorized, except as specified herein.
- 5. <u>BASIS</u>: This special permit is based on the application of Schlumberger Technology Corp. dated June 9, 2023, submitted in accordance with § 107.109.

## 6. <u>HAZARDOUS MATERIALS (49 CFR 172.101)</u>:

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identi- fication Number	Packing Group
Compressed gas, toxic, flammable, n.o.s. Inhalation hazard Zone B	2.3	UN1953	N/A
Hydrocarbon gas mixture, compressed, n.o.s.	2.1	UN1964	N/A
Hydrocarbon gas mixture, liquefied, n.o.s.	2.1	UN1965	N/A
Hydrogen sulfide	2.3	UN1053	N/A
Liquefied gas, flammable, n.o.s.	2.1	UN3161	N/A
Nitrogen, compressed	2.2	UN1066	N/A
Petroleum gases, liquefied <i>or</i> Liquefied petroleum gas	2.1	UN1075	N/A

### 7. <u>SAFETY CONTROL MEASURES</u>:

a. <u>PACKAGING</u>: Prescribed packagings are non-DOT specification cylinders conforming to Schlumberger Technology Corporation drawing number 101558955D dated May 9, 2016, or 104386231D dated March 8, 2023 on file with the Office of Hazardous Materials Safety (OHMS) and with the requirements for DOT Specification 3A cylinders (§178.35 and §178.36) except as follows:

§ 178.35(e) *Safety Devices*. No pressure relief device is required on the completed cylinder.

§ 178.35(f) *Markings*. Cylinders must be marked to read "DOT-SP 20352" in lieu of "DOT-3A" followed by the service pressure.

§ 178.36(a) *Type, Size and Pressure*. The cylinder bodies and components are machined from solid bar stock. The maximum service pressure shall not exceed 18,000 psig.

§ 178.36(b) Steel. The authorized material of construction is Inconel 718, per Schlumberger Material Specification 100007444 on file with OHMS. The materials wetted with reservoir fluids must meet the requirements of the National Association of Corrosion Engineers (NACE) specification MR-0175 for suitability in hydrogen sulfide H<sub>2</sub>S service.

§ 178.36(f) *Wall thickness*. Minimum wall thickness must not be less than 0.2435 inch.

§ 178.36(g) Heat Treatment.

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Block components of Inconel 718 may undergo Salt Bath Nitriding per Schlumberger Coating Specification 101257837 and Dursan Inert Coating as per Schlumberger Coating Specification 101233101 on file with OHMS. The heat treatment of the purchased stock material must conform to the Schlumberger material specifications.

§ 178.36(h) *Openings in cylinders and connections*. Openings and connections must conform as shown in the Schlumberger drawings on file with the OHMS.

§ 178.36(j) Flattening test. No flattening test is required.

§ 178.36(1) *Acceptable results for physical flattening tests*. The acceptable results for the required bar stock physical tests specified in §178.36 (k) is as follows:

Minimum Tensile Strength	175,000 psi
Minimum Yield Strength	125,000 psi
Minimum Elongation on 4D	20%
Minimum Reduction of Area:	
Test coupon cross section thk < 10 in	35%
Test coupon cross section thk > 10 in	25%
Maximum Rockwell C Hardness	40 HRC

For Inconel 718 bar stock:

Yield strength must be determined by the "offset" method as prescribed in ASTM Standard E8.

§ 178.36(m) Leakage test. No leakage test is required.

§ 178.36(n) *Rejected cylinders*. Rejected cylinders may not be re-heat treated.

b. <u>TESTING</u>: Each cylinder must be re-inspected and hydrostatically re-tested in accordance with §§ 180.205 and 180.209 as prescribed for specification DOT 3A cylinders. Reheat treatment or repair of rejected cylinders is not permitted.

c. <u>OPERATIONAL CONTROLS</u>: The proprietary sample cylinder,FNLT and MPSL, assemblies may be shipped either placed in its dedicated transit case or installed in the Reservoir Sampling Tool,FSCM and SCM, respectively.

# 8. <u>SPECIAL PROVISIONS</u>:

a. In accordance with the provisions of Paragraph (b) of § 173.22a, persons may use the packaging authorized by this special permit for the transportation of the hazardous materials specified in paragraph 6, only in conformance with the terms of this special permit.

b. A person who is not a holder of this special permit, but receives a package covered by this special permit, may reoffer it for transportation provided no modification or change is made to the package and it is offered for transportation in conformance with this special permit and the HMR.

c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

d. Each packaging manufactured under the authority of this special permit must be either (1) marked with the <u>name of the manufacturer and location (city and state) of the facility at which it is manufactured</u> or (2) marked with a <u>registration symbol</u> designated by the Office of Hazardous Materials Safety <u>for a specific manufacturing facility</u>.

e. A current copy of this special permit must be maintained at each facility where the packaging is manufactured under this special permit. It must be made available to a DOT representative upon request.

f. Transportation of Division 2.1 (flammable gas) or Division 2.3 (poison inhalation hazard) hazardous materials is not authorized aboard cargo vessel or aircraft unless specifically authorized in the Hazardous Materials Table (§ 172.101).

9. <u>MODES OF TRANSPORTATION AUTHORIZED</u>: Motor vehicle, rail freight, cargo vessel, and cargo-only aircraft.

- 10. <u>MODAL REQUIREMENTS</u>: A current copy of this special permit must be carried aboard each cargo vessel, aircraft, or motor vehicle used to transport packages covered by this special permit. The shipper must furnish a copy of this special permit to the air carrier before or at the time the shipment is tendered.
- 11. <u>COMPLIANCE</u>: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 <u>et seq</u>:
  - o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
  - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
  - o Registration required by § 107.601 <u>et seq</u>., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)— "The Hazardous Materials Safety and Security Reauthorization Act of 2005" (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term "exemption" to "special permit" and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. <u>REPORTING REQUIREMENTS</u>: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this

special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:

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for William Schoonover Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, East Building PHH-13, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at <u>https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search</u>. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: AC/TG