



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

1200 New Jersey Avenue, SE
Washington, DC 20590

May 10, 2024

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

Reference No. 23-0097

Dear Mr. Murphy:

This letter is in response to your October 31, 2023, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping papers. Specifically, you request clarification on the requirement to indicate the type of packages on a shipping paper, in accordance with § 172.202(a)(7), as it relates to transporting jet perforating guns (JPGs), shipped under the proper shipping name “UN0494, Jet perforating guns, charged, 1.4D.” You ask what the package type should be to describe “UN0494, Jet perforating guns, charged, 1.4D” on a shipping paper, in accordance with § 172.202(a)(7).

Unless a specific packaging method has been prescribed by the Pipeline and Hazardous Materials Safety Administration (PHMSA) on an EX approval or applicable Department of Transportation (DOT) special permit, JPGs are typically transported unpackaged under the provisions of § 173.62, Packaging Instruction US1. Because your JPGs are transported as unpackaged articles, there is no packaging type to indicate on your shipping paper, as would otherwise be required under § 172.202(a)(7). Therefore, it is the opinion of this Office that for unpackaged articles described in this scenario, it is permitted to provide an accurate descriptor of the articles in lieu of a packaging type for the requirements of § 172.202(a)(7)—examples include “jet perforating guns,” “JPGs,” or “explosive articles.”

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 "S. Andrews".

Steven Andrews
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Letter of Interpretation Request - Hunting Titan
Date: Wednesday, November 1, 2023 11:04:04 AM
Attachments: [Hunting Titan Letter of Interpretation Request - 10-31-2023.pdf](#)

Hi Alice,

Please see the attached interpretation request. Let us know if you need anything.

Sincerely,
Janaye

From: Joe Murphy <Joe.Murphy@Hunting-intl.com>
Sent: Tuesday, October 31, 2023 3:13 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Letter of Interpretation Request - Hunting Titan

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. If any further info is needed, please let me know. Thank you.

Respectfully,

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

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October 31, 2023

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
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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 requests an interpretation of 49CFR172.202(a)(7).

The number and type of packages must be indicated. The type of packages must be indicated by description of the package (for example, "12 drums"). Indication of the packaging specification number ("1H1") may be included in the description of the package (for example, "12 1H1 drums" or "12 drums (UN 1A1)"). Abbreviations may be used for indicating packaging types (for example, "cyl." for "cylinder") provided the abbreviations are commonly accepted and recognizable.

Specifically, we ship and transport UN0494, Jet perforating guns, charged, 1.4D daily as part of our business.

Question 1: What does PHMSA believe is the best "type" of package that should be listed in the number and type column? The jet perforating guns are various lengths of pipe containing shaped charges, detonator cord and boosters. We believe pipe is not an accurate reflection of the material and it is not your typical cylinder under gaseous pressure.

Question 2: Could we call it a "jet perforating gun" and abbreviate it as JPG?

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