



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

1200 New Jersey Avenue, SE  
Washington, DC 20590

June 30, 2021

Mr. Joseph Murphy  
Hunting Titan  
16825 Northchase Drive, Ste. 600  
Houston, TX 77060

Reference No. 21-0013

Dear Mr. Murphy:

This letter is in response to your February 8, 2021, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to special provision 114 for “UN0494, Jet perforating guns, charged, *oil well, without detonator*.” In your letter, you note that—as provided by Special Provision 114 in § 172.102(c)(1)—jet perforating guns may be reclassified to Division 1.4 Compatibility Group D (1.4D) if: (1) 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 (2) the guns are packaged in accordance with Packing Method US 1 as specified in § 173.62. You state that your company would like to transport jet perforating guns containing 400 pounds of explosive contents on two separate “vehicles” in a single shipment. Your proposed configuration consists of 200 pounds of explosive contents on a truck, with an additional 200 pounds of explosive contents on a flatbed trailer attached to the truck. You ask whether this proposed configuration complies with the HMR and whether the term “vehicle”—as used in Special Provision 114—refers to “transport vehicle” or “motor vehicle” as defined in § 171.8.

The answer is no, your proposed configuration does not comply with the HMR. It is the opinion of this Office that the word “vehicle” as used in Special Provision 114 of § 172.102(c)(1) refers to the term “motor vehicle” as defined in § 171.8. Specifically, a “motor vehicle” means “a vehicle, machine, tractor, trailer, or semitrailer, or any combination thereof, propelled or drawn by mechanical power and used upon the highways in the transportation of passengers or property.”

Therefore, a shipment of more than 200 pounds of explosive content would not be authorized on a single motor vehicle.

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

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)  
**Subject:** FW: Letter of Interpretation Request - Hunting Titan, Inc.  
**Date:** Tuesday, February 9, 2021 2:50:04 PM  
**Attachments:** [Hunting Titan Letter of Interpretation Request.pdf](#)

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Dear Alice,

Please see the attached request for a letter of interpretation. Please contact our office with any questions.

Thank you,

Sarah (HMIC)

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**From:** Joe Murphy [mailto:Joe.Murphy@Hunting-intl.com]  
**Sent:** Monday, February 8, 2021 7:32 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Letter of Interpretation Request - Hunting Titan, Inc.

**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.

Regards,

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

**WIPE surfaces, WEAR mask, WATCH distance, WASH hands**

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February 08, 2021

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

Office 281-448-2200  
Fax 281-448-2227  
[www.hunting-intl.com](http://www.hunting-intl.com)

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

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 (a) does the word vehicle refer to transfer vehicle? In 49CFR171.8 Transport vehicle means a cargo-carrying vehicle such as an automobile, van, tractor, truck, semitrailer, tank car or rail car used for the transportation of cargo by any mode. Each cargo-carrying body (trailer, rail car, etc.) is a separate transport vehicle.

Our question, can we transport a total weight of 90.5kg (200 pounds) of loaded jet perforating on one shipment but two separate transport vehicles? Our example is a truck with a flatbed trailer.

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](mailto:joe.murphy@hunting-intl.com).

Respectfully,

*Joseph Murphy*

Joseph Murphy  
Compliance Manager, Hazardous Materials



February 08, 2021

**Hunting Titan**  
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*Joseph Murphy*

Joseph Murphy  
Compliance Manager, Hazardous Materials