



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

JUN 18 2014

Mr. George M. Doggett
Director, Corporate Compliance
Pioneer Energy Services
102 Magnate Drive, Suite 101
LaFayette, LA 70508

Ref. No.: 14-0111

Dear Mr. Doggett:

This is in response to your email dated May 15, 2014, requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relating to the status of Packing Method US1 in the § 173.62(c) Table of Packing Methods.

Due to an editorial oversight, Packing Method US1 in the § 173.62(c) Table of Packing Methods was inadvertently removed from the HMR. Efforts are being made by this office to have US1 expeditiously restored to the HMR. In the interim, the provisions of US1 may still be used for the packaging and transportation of applicable materials and articles.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Shane C. Kelley". The signature is written in a cursive style with a long, sweeping underline.

Shane C. Kelley
Acting International Standards Coordinator
Standards and Rulemaking Division

Babich
§172.102 SP 55^a 114
§173.63

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, May 29, 2014 5:08 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Letter of Interpretation

Explosives
14-0111

Hi Carolyn,

This caller requested we submit this e-mail as a formal letter of interpretation. Note Adam Lucas has been working with PHH10 on this issue. Whoever is assigned to the letter may want to discuss this issue further with him.

Thanks,

Victoria

From: Doggett, George [<mailto:GDoggett@pioneerres.com>]
Sent: Thursday, May 15, 2014 5:43 PM
To: INFOCNTR (PHMSA)
Subject: Letter of Interpretation

Dear sir;
Pioneer Wireline Services, LLC is an oilfield service company. We operate specially designed oilfield service trucks and transport Jet Perforating Guns to oil and gas wells in order to perforate and produce those wells for hydrocarbons.

In the 172.101 table listed under Jet Perforating Guns, 1.4D, UN0494, there are special provisions 55 and 114 identified under column (7) 172.102. Special Provision 114(b) indicates that *The guns are packaged in accordance* with Packing Method US 1 as specified in 173.62 of this subchapter. A review of 173.62 exposes that Packing Method US 1 is not available in the Table of Packing Methods. After discussion with one of your representatives at the *Hazardous Materials Information Center*, it is my understanding that this was an inadvertent deletion and that the US 1 Packing Method is still germane to Jet Perforating Guns.

Because I have a number of EX numbers assigned by PHMSA for various perforating gun configurations transported by my company, all of which refer to the US 1 Packing Method, could you please provide me with a letter of interpretation indicating that this Packing Method is still applicable for domestic transportation?

*Please note, my cell phone number has recently changed!
Please update my cell phone information to reflect the new number below.*

George M. Doggett
Coiled Tubing & Wireline Services

Director Corporate Compliance
Corporate Support Services

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