



U.S. Department  
of Transportation

1200 New Jersey Avenue SE  
Washington, DC 20590

**Pipeline and Hazardous  
Materials Safety  
Administration**

FEB 10 2012

Mr. Tim Redwine  
Weatherford International  
495 Winscott Road  
Fort Worth, Texas 761256

Reference No.: 11-0311

Dear Mr. Redwine:

This responds to your letter requesting clarification of Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to limited quantities of compressed gases. In your incoming letter, you describe an accumulator system that functions as part of a natural gas or oil drilling rig. You also include a picture of this accumulator system. You ask whether this accumulator system, as shown in the picture, is excepted from the HMR as specified in § 173.306(f).

The answer is yes. In accordance with § 173.306(f)(1), provided the accumulator system is installed in either a motor vehicle, construction equipment, or assembled machinery and is designed and fabricated with a burst pressure of not less than five times their charged pressure at 70 °F., the accumulator system would not be subject to any other requirements of the HMR. As described in your incoming letter and shown in the accompanying picture, this accumulator system meets the requirements specified in § 173.306(f)(1) and is excepted from the HMR.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

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

Benedict  
§ 173.306(g)(1)  
Cylinders  
11-0311

September 1, 2011

Mr. Charles E. Betts  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590

Dear Mr. Betts:

This letter is written requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to limited quantities of compressed gases. Will the accumulator system pictured below be excepted from regulation under § 173.306(f)(1). This type of equipment is to be transported to an oil or natural gas site drilling rig and is used to "shut in" a well bore. Each cylinder has a burst pressure 5 times greater than the charged pressure @ 70 degrees. The five accumulators pictured are plumbed into a manifold system with each cylinder pre-charged to 1000 psig.



Sincerely,

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