

PROGRAM DIRECTIVE

Program Directive No. A-151
Issued December 1, 1986
Revised May 25, 2001

SUBJECT: Oil-Well: Transporting Select Fire Perforating Guns

AFFECTED CODES/

DIRECTIVES: OAR 437-02-1910.109(b)(1), Handling and Use of Explosives and Blasting Agents and STD 1-5.18

PURPOSE: To provide guidelines for evaluating compliance with 1910.109(b)(1) when transporting specially designed and equipped select fire oil-well perforating guns with detonators affixed under certain conditions.

BACKGROUND:

- A. The United States Department of Transportation (DOT) has granted Exemption DOT-E 8845 to the Pengo Industries, Inc., Fort Worth, Texas, to transport from the gun assembly site (wireline shop) to the jobsite, specially designed and equipped select fire oil-well perforating guns with detonators affixed. They believe that the hazard in transporting the particular assembled gun over the highway has been eliminated. Other companies have received party status to the exemption.
- B. OR-OSHA concurs with DOT on the highway transportation from the assembly shop to the jobsite and allows further transportation on the job-site directly to the oil-well site under the following conditions. Pengo also provides to its customers, procedures for the safe handling and use of the select fire guns. The provisions of the DOT exemption include:
 - 1. The charged oil-well guns classed as Class A or Class C explosive are identified as "Select Fire Hollow Steel Carriers" and "Select Fire Retrievable Tubing Guns" and are the only ones so exempted.
 - 2. Transportation must be by motor vehicle or cargo vessel and only be private carriers engaged in oil-well operations.

3. Transportation is authorized only from the gun assembly site (wireline shop) to the jobsite.
4. Vehicle operator must be instructed as to the necessary safeguards and proper procedure in the event of an unusual delay, fire or accident.
5. A copy of the Exemption DOT-E 8845 must be carried aboard each motor vehicle and vessel used to transport packages covered by this exemption, attesting that the wireline operator has been granted the Exemption DOT-E 8845 certificate.

ACTION:

This program directive is based on the need to resolve the potential inconsistency in applying 1910.109(b)(1) and a DOT exemption which permits under certain specified conditions the transportation of Pengo charged oil-well guns with detonators attached. 1910.109(b)(1) requires that detonators and explosives be transported separately over the highways. While this rule only covers public highways regulated by DOT, OR-OSHA believes transport of these devices in many off-highway situations may violate 1910.109(b)(1); however, OR-OSHA has determined that it is a minimal violation to transport directly to the oil-well site charged oil-well guns with detonators attached, if the gun is covered by DOT Exemption DOT-E 8845 and the Detonation Interruption Device (DID) is in place between each detonator and the primacord leading to the individual jet perforator. It is thus permissible to use the DOT Exemption DOT-E 8845 in the transportation of charged oil-well guns with detonators attached.

**EFFECTIVE
DATE:**

This program directive is effective immediately and will remain in effect until cancelled or superseded.