



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

SEP - 8 2006

400 Seventh Street, S.W.
Washington, D.C. 20590

Mr. Joe Huber
Production Superintendent
Devon Energy Corporation
7525 Highway 2 NW
Havre, MT 59501

Ref. No.: 06-0183

Dear Mr. Huber:

This is in response to your August 2, 2006 letter concerning limited quantity shipments of natural gas under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). According to your letter, you ship natural gas in IsoTube[®] cylinders with a capacity of 110 milliliters, at a pressure of less than 50 psig.

When transported by highway, § 173.306(a)(1) exempts limited quantities of certain compressed gases, including compressed natural gas, from labeling (except when intended for further transportation by air) and the specification packaging requirements when packaged in containers of not more than 4 fluid ounces capacity (7.22 cubic inches or less). Each package must conform to the general requirements in § 173.24 and 173.24a, and may not exceed 30 kg (66 pounds) gross weight. In addition, limited quantity shipments of compressed natural gas must meet all other requirements in the HMR from which they have not been excepted.

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

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



060183

173.306(a)(1)
173.24
173.24a

Drakeford, Carolyn <PHMSA>

From: Gorsky, Susan <PHMSA>
Sent: Wednesday, August 02, 2006 3:00 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: HazMat Certification

Attachments: Document (23).pdf

Pollack
§173.306(a)(1)
Cylinders
06-0183

Please make this an interp. Thanks.

-----Original Message-----

From: Romero, Pat <PHMSA>
Sent: Wednesday, August 02, 2006 2:50 PM
To: Gorsky, Susan <PHMSA>
Subject: Fw: HazMat Certification



Document (23).pdf
(1 MB)

Susan. Please fwd 2 cyl ech: cc me
Please help. Pat

-----Original Message-----

From: Stone, Cassie
To: Romero, Pat <PHMSA>
CC: Halter, Bev
Sent: Mon Jul 31 11:56:06 2006
Subject: FW: HazMat Certification

These cylinders are used for sending samples of natural gas to the lab for analysis. We currently wish to ship back to the lab some aluminum cylinders which were provided by the lab. They are pressure rated to 100 psi and filled at less than 50 psi with natural gas from the wellhead. We currently have 20 tubes that are approx 1" in diameter and 7" in length. According to Isotech Laboratories Inc. these tubes and the shipping box are DOT approved. Please see attachment. Your quick response would be greatly appreciated as we need to make shipping arrangements as soon as possible.

Joe Huber
Production Superintendent
Devon Energy Corporation
Havre, MT
Office (406) 265-0181
Cell (406) 945-5198

From: Pat.Romero@dot.gov [mailto:Pat.Romero@dot.gov]
Sent: Monday, July 31, 2006 1:54 AM
To: Stone, Cassie
Subject: RE: HazMat Certification

Aloha Cassie

Thanks for the inquiring. I will send you a package so you can start your training. Please tell me what size will the cylinders be...PSI? Would you be shipping by air, are the cylinders to be sold over the counter to the general public or another commercial vendor? Are these US DOT cylinders? Are you filling and \charging compress gases?

I'm on a business trip until the end of this week...however; I'll be getting some help.
Pat

Patricio F Romero
Office of Hazardous Materials Initiatives and Training
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
Hazardous Materials Safety Assistance Team
Western Region
3401 Centrelake Drive, Suite 550B
Ontario, CA 91761
Voice (909) 937-7225, Fax (909) 390-5142
Website: <http://hazmat.dot.gov> <BLOCKED::http://hazmat.dot.gov/>

From: Stone, Cassie [mailto:Cassie.Stone@dvn.com]
Sent: Friday, July 28, 2006 9:42 AM
To: Romero, Pat <PHMSA>
Cc: Huber, Joe; Halter, Bev
Subject: HazMat Certification

Pat,

Our Street address is Devon Energy, 7525 Hwy 2 NW, Havre, MT 59501.

Also, you can contact me @ 406-265-5521.

We will be shipping Compressed Natural Gas in stainless steal tubes. Thank you very much for the information.

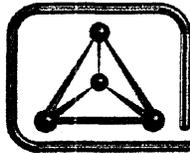
Cassie

Cassie Stone
Field Technician
Devon Energy
P.O. Box 1644
7525 Hwy 2 NW
Havre, MT 59501
Phone: (406) 265-0684

Fax: (405) 265-4938

Email: cassie.stone@dvn.com

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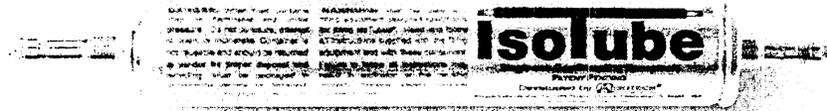


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ISOTECH LABORATORIES, INC. WWW.ISOTECHLABS.COM

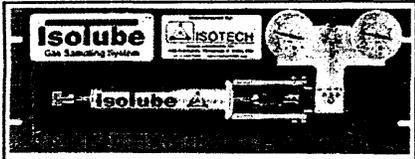
1308 Parkland Court Champaign, IL 61821 • (217) 398-3490 • Fax: (217) 398-3493 • isotubes@isotechlabs.com

IsoTube[®] Gas Sampling Equipment



For Mud-gas sampling:

- Extremely durable and reliable resulting in reduced sample loss.
- Easier to use than gas bags.
- Less bulky to store than gas bags (shipped 25 per box).
- Can be configured in line with the normal mud-logging equipment.
- Can be legally shipped on both passenger and cargo aircraft according to IATA regulations.**
- HAZMAT Packaging is included. UN Certified shipping boxes meet all DOT and IATA requirements for shipment of flammable gases in IsoTubes[®].
- HAZMAT packaging was developed and tested specifically for use with the IsoTubes[®].
- Environmentally "friendly" IsoTubes[®] are >99.9% recyclable; IsoTubes[®] returned to Isotech result in a substantial reduction in waste compared to gas bags.



As a substitute for cylinders:

- IsoTubes[®] are acceptable for pressurized sampling (limit: 100 psig; requires IsoTube[®] Wellhead Sampling Device).
- IsoTube[®] shipping boxes are approved for air shipment, rapid return of samples to the laboratory is facilitated.
- Smaller size and weight result in a reduction in shipping costs (volume ~110 ml).

**** (Hazardous materials can only be shipped by someone properly certified to do so; shipping instructions are included with each box of IsoTubes[®])**