



U.S. Department  
of Transportation

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**Pipeline and Hazardous  
Materials Safety Administration**

**The US Department of Transportation  
Competent Authority for the United States**

November 19, 2008

Mr. Lon Santis  
Institute of Makers of Explosives (IME)  
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Suite 310  
Washington, DC 20036

This letter is to notify you that the AESC/IME Perforating Gun Specifications indicated in your submittal "Approval of Perforating Guns -- AESC/IME Perforating Gun Approval Guidance Document", dated August 26, 2008 have been reviewed and are acceptable for use in the Approval process for the classification of jet perforating guns.

One issue which needs to be addressed is the requirement in the paragraph 5.1.3 of this Guidance document that certain components must be manufactured, imported, or distributed by an AESC or IME member company. The program needs to be available to all who can make the prescribed certifications, and we would appreciate your thoughts on how we can accomplish this.

Of course, as your *Guide* makes clear, all energetic components must have been approved under the provisions of 49 CFR 173.56. Applicants must certify that all explosive components have been approved under 49 CFR 173.56 and must maintain copies of these approvals at the locations that the jet perforating gun is assembled.

In general, applicants must certify familiarity with all provisions applicable to Hazmat shippers, specifically including Subpart C of 49 CFR 173, and the Hazardous Materials Table including applicable Special Provisions.

We very much appreciate all the work your organizations have put into this program. If you have any questions please do not hesitate to contact me at (202)366-4535.

Sincerely,



for Theodore L. Willke  
Associate Administrator  
for Hazardous Materials Safety

cc Association of Energy Service Companies (AESC)  
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