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GOVERNOR

State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF CONSERVATION

THOMAS F. HARRIS
SECRETARY

RICHARD P. IEYOUB
COMMISSIONER OF CONSERVATION

MEMORANDUM

POLICY NO.: IMD-GS-12

EFFECTIVE DATE: October 6, 2022

SUBJECT: Public Reporting of Potential UIC Violations

BACKGROUND:

On September 17, 2021, the State of Louisiana submitted the document entitled "Class VI USEPA Primacy Application" to the United States Environmental Protection Agency. The submission proposes to revise the existing Underground Injection Control (UIC) program under Section 1422 of the Safe Drinking Water Act (SWDA) by adding primary enforcement authority over Class VI geologic sequestration wells.

The Louisiana Department of Natural Resources (LDNR) is the lead agency to coordinate the implementation of the Class VI UIC program as authorized by Section 1442 of SWDA. The Injection and Mining Division (IMD), a division within LDNR, shall administer the Class VI UIC program consistent with the state's submission for program approval, the program Memorandum of Agreement (MOA) with Addendums, the SWDA, current federal policies and regulations, promulgated minimum requirements, priorities established as part of the annually approved state UIC grant, state and federal law, and any separate working agreements which shall be entered into with the Regional Administrator as necessary for the full administration of the Class VI UIC program

LDNR's submission for program approval states that, "The LDNR shall provide the opportunity for the public to submit information on violations and shall have procedures for receiving, investigating, and ensuring proper consideration of the information."

Additionally, 40 CFR 145.12(b) (4) states that the state shall maintain, "Procedures for receiving and ensuring proper consideration of information submitted by the public about violations. Public effort in reporting violations shall be encouraged and the State Director shall make available information on reporting procedures."

The IMD website currently provides contact information for this Office in the form of a physical address, a mailing address, a phone number, a division email address, and an email address for the IMD Director. Contact information to report environmental emergencies is also available on the IMD website. This includes a toll-free hotline for the Louisiana State Police and a 24-hour service phone number specifically designated for the reporting of incidents related to injection wells or exploration and production (E&P) wastes.

POLICY:

Members of the public can report possible injection well violations by filling out and submitting a UIC Incident Report (Attachment 1). Upon completion and submission of the report, it will be sent to the primary IMD email address. The report will then be forwarded to the an IMD supervisor or manager to review and determine whether an investigation is warranted or if additional information may be needed.

Any tips or complaints submitted to IMD via mail, email, or phone call will also be forwarded to the appropriate IMD supervisor or manager to review whether an investigation is warranted or if additional information may be needed. Mail, email, and phone submissions will be given the same level of due consideration as the submissions via the UIC Incident Report and will be reviewed accordingly.

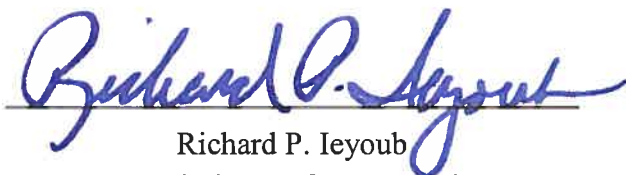
All reports that are deemed relevant will receive written responses if contact information is included with the submission.

A summary of all reports of possible injection well violations submitted to IMD by members of the public will be prepared for the IMD Director at the end of each month. This summary will detail each tip or complaint received and its review status.

The UIC Incident Report is not intended for the reporting of events that may lead to an immediate threat to human health or the environment. All environmental emergencies related to injection wells should be reported immediately to the State Police so that the appropriate response personnel will be deployed. However, members of the public are encouraged to utilize the 24-hour service phone number designated for incidents related to injection wells after contacting the State Police.

APPROVED BY:

Stephen H. Lee, Director
Injection & Mining Division



Richard P. Ieyoub
Commissioner of Conservation