



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

October 25, 2023

Via Email

Ms. Monique M. Edwards
Commissioner
Louisiana Department of Natural Resources
Office of Conservation
617 North Third Street
Baton Rouge, LA 70802

Dear Commissioner Edwards:

On August 28- September 1, 2023, the Pipeline and Hazardous Materials Safety Administration (PHMSA) conducted an evaluation of the pipeline safety program activities carried out by the Louisiana Department of Natural Resources, Office of Conservation (LDNR) in Calendar Year (CY) 2022. This evaluation included a review of annual Progress Report documents and pipeline program procedures and records, as well as observation of an on-site pipeline operator inspection by LDNR staff.

PHMSA conducted our evaluation pursuant to Sections 60105(e) and 60106(d) of Title 49 of the United States Code, which authorizes PHMSA to monitor state pipeline safety programs. This annual evaluation is designed to ensure compliance with the Pipeline Safety Act requirements and to provide information that will allow PHMSA to determine the state's total pipeline safety grant score for the upcoming year.

PHMSA assesses the overall performance of a state's pipeline safety program by scoring information contained in the pipeline safety program Progress Report and by conducting a Program Evaluation. Detailed results are below:

Progress Report Review

For CY 2022, both the LDNR Gas and Hazardous Liquid Pipeline Safety Programs scored 50 out of a possible 50 points.

Program Evaluation Review

For CY 2022, the LDNR Gas Pipeline Safety Program scored 100 out of a possible 100 points and the LDNR Hazardous Liquid Pipeline Safety Program scored 96 out of a possible 96 points.

As you may be aware, PHMSA and the National Association of Pipeline Safety Representatives developed a set of performance metrics that are available to the public on PHMSA's stakeholder communication website, <http://primis.phmsa.dot.gov/comm/states.htm>. These metrics relate to the state's leak management, incident investigations, and damage prevention program, as well as its inspector qualification, inspection, and enforcement activities. PHMSA expects each state pipeline safety program to review these metrics and act, as necessary, to continuously improve performance trends, thereby supporting enhanced pipeline safety.

Additionally, PHMSA encourages initiatives to remove and/or replace unprotected steel, cast-iron, and other high-risk pipe within those gas distribution operators under the LDNR authority. According to our data, there was a total of 79 miles of cast iron mains and 390 services remaining in CY2022 in the State of Louisiana. PHMSA appreciates the efforts of the LDNR in eliminating the amount of high-risk pipe from the state's distribution infrastructure. PHMSA encourages the LDNR to continue to provide operator incentives to reduce the amount of high-risk pipe resulting in reduced leaks, failures, and improve public safety.

A response is not necessary; however, your comments are welcomed addressed to me at 3700 S. MacArthur Blvd., Suite B, Oklahoma City, Oklahoma 73179-7612. Additionally, please email a PDF of your signed response to zach.barrett@dot.gov and don.martin@dot.gov. Thank you for your continued support of pipeline safety.

Sincerely,



Zach Barrett
Director, State Programs

cc: Mr. Michael Peikert, Assistant Director, LDNR
Mr. Bryan Lethcoe, Director, PHMSA Southwest Region, PHP-400
Mr. Agustin Lopez, State Liaison, PHMSA State Programs, PHP-50