

**Pec Direzione**

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**Da:** ilarialisagiangrande <ilarialisagiangrande@pec.it>  
**Inviato:** giovedì 25 settembre 2014 08:20  
**A:** segreteria minambiente; min mare; min ambiente  
**Oggetto:** in allegato osservazioni vs Elsa2  
**Allegati:** Elsa2014\_Cecchine.pdf; Elsa2014\_Chou.pdf; Elsa2014\_LitusFoundation.pdf; Elsa2014\_Syntax.pdf; Elsa2014\_StopFrackingCaliforniaState.pdf

**Priorità:** Alta

Cecchine  
Chou  
Litus Foundation  
Syntax  
StopFrackingCalifornia



Ministero dell'Ambiente  
Direzione Salvaguardia Ambientale del Ministero dell'Ambiente e della Tutela del Mare, Divisione IV  
Attenzione: Concessione BR 268 RG Petroceltic  
Via Cristoforo Colombo 44 - 00147 Roma

New York, Sept 24<sup>th</sup> 2014

Dear Representatives of the Italian government:

I am the child of Abruzzo emigrants to the United States with close ties to Italy and to Abruzzo, where my father was born. I work as a filmmaker in New York City and topics of climate change and oil consumption and production are dear to my heart. I am writing to recommend that authorization be denied to the drilling permit BR 268 RG off the coast of Abruzzo, as filed to your offices by Dublin based Petroceltic. The "Elsa 2" permit is located only 7 kilometers from shore, between Ortona and Francavilla a Mare, flanked by two natural regional reserves – Punta dell'Acquabella and Ripari di Giobbe -- and in close proximity to the protected areas of Punta Aderci, Grotta delle Farfalle, Lecceta di Torino di Sangro. Elsa 2 is the first of at least ten new leases in the central Adriatic that Petroceltic owns. If approved, this exploratory well could turn into a permanent drilling operation and be followed by a slew of other leases, similarly close to shore. In many ways we are worried that this project would morph into a novel Ombrina Mare, requiring an FPSO desulfurizing unit and a series of pipelines for extracting and treating heavy sour oil.

Offshore drilling has negative effects on marine life, coastal communities and on the health of residents. Drilling muds, brine wastes and produced waters are daily disposed of at sea while deck runoff water and pipeline leaks are common problems. As a result, either voluntarily or by accident, offshore rigs dump into the water tons of drilling fluids, metal cuttings and toxic metals that contain lead, chromium, mercury and benzene, which is carcinogenic. At times, catastrophic spills and blowouts may occur extolling heavy damages to the environment, to people, to local economic activities such as fishing and tourism. The case of Elsa is particularly disturbing due not only due to its proximity to shore and the effects of oil on the ecosystem, but also because it sets a perilous path for the very essence of Abruzzo, whose economy is based on tourism, fishing and agriculture. The entire coastal area where Petroceltic intends to drill, is soon to become a National Park, and is known for its rough beauty and pristine waters. Several beaches in the area employ many people in recreational activities and local small businesses depend on a healthy coast as the foundation for their livelihood. People visit Abruzzo to experience nature and to engage in recreational fishing and surfing, not to see oil platforms. Offshore exploration is misguided and presents significant risks to the future of Abruzzo's economy.

From a larger point of view, our climate is quickly changing in fast, unpredictable ways disrupting entire eco-systems. The primary cause of these changes is the use of fossil fuels: we cannot afford to keep the status quo. Instead of drilling Elsa 2, Italy should be one of the world's leaders in renewable energy due to its geographical position and its abundant solar and wind resources. Abruzzo, blessed by such natural beauty, should stay green, fossil-fuel free and healthy for present and future generations.

Finally, I urge Italian officials to promote a dialogue with other countries that share borders with the Adriatic, and that together Italy, Croatia, Slovenia and Albania, may find a constructive resolution to ban offshore drilling within the entire Adriatic Sea, to save its shores, its marine life and its biodiversity for future generations.

Thank you,

Randi Cecchine

Independent documentary shooter/editor/producer, freelancer, and sometime educator living in New York.



Professor Tom Chou  
Dept. of Biomathematics  
Dept. of Mathematics  
David Geffen School of Medicine  
University of California  
Tel. (310) 206-2787  
Fax. (310) 825-8685

Los Angeles, September 25th 2014

Dear Representatives of the Italian government,

I am a professor with a Ph.D. in physics and I teach in the medical school at the University of California. I am writing you to express my concern about the proposed offshore drilling along the Abruzzo coast, according to lease Elsa2, BR 268 RG as proposed by Petroceltic of Dublin.

The Deepwater Horizon disaster focused international attention on offshore blowouts. Indeed, they happen more often onshore, with dangerous effects: releases of flammable and toxic gases, spills of oil and drilling fluid, and plumes of groundwater pollution. Blowouts can result from the failure of blowout preventers, designed to seal off the well bore and block a surge of gas or pressurized oil from underground. Gaseous muds, gas condensates, and crude oil, may bubble up around the rig accompanied by sulfurous smells wafting through the air causing problems to people's skin, respiratory, circulatory and neurological systems. Also, under normal operating conditions, one must take into account the large amount of waste associated with onshore oil and gas production such as drilling-waste fluids or muds, drilling-waste solids, produced water, and volatile organic compounds.

The drilling-waste muds may be freshwater gel, salt water (potassium chloride or sodium chloride), or oil invert-based systems. The oil invert mud systems may contain up to 50%, by volume, of diesel oil. Drilling wastes may contain drilling muds (bentonite), borehole cuttings, additives (polymers, oxygen scavengers, biocides, and surfactants), lubricants, diesel oil, emulsifying agents, and various other wastes that are specifically related to the drilling activities. Drilling-waste solids, which are made up of the bottom layer of drilling-mud sump materials, may contain drill cuttings, flocculated bentonite, and weighting materials and other additives. Additional wastes from the drilling process include used oils, cementing chemicals, and toxic organic compounds. Field processing of crude oil generates several waste streams, including contaminated wastewater, tank bottoms that may contain lead, emulsions, and heavy hydrocarbon residues, which may contain polynuclear aromatic hydrocarbons (PAHs). Cooling tower blowdown, boiler water, scrubber liquids, and steam production wastes are also generated, as well as contaminated soil, used oil, and spent solvents. Wastewaters typically contain suspended solids. To control the growth of microorganisms in sour water, a

biocide or hydrogen sulfide scavenger (for example, sodium hypochlorite) is generally used prior to reinjection or disposal of the water. Crude pipelines are routinely cleaned by pigging operations, which can lead to spills and to the generation of sludge containing heavy metals. Solid wastes that do not contain toxic material are used as backfill material. Among the main sources of air emissions are fired equipment, vents, flares (including those from compressor stations), and fugitive emissions. The emissions may contain volatile organic compounds (VOCs), sulfur oxides (SO<sub>x</sub>), hydrogen sulfide, and nitrogen oxides (NO<sub>x</sub>).

In 2011, the European Commission published a working paper called “Safety of offshore oil & gas Impact Assessment Annex I”. The article notes that data taken from the Oil and Gas Producer association directory lists at least 98 major accidents that have occurred in the North Sea in the years 1970-2007, yielding an aggregated rate of 2.6 accidents per year. Other figures taken from the SINTEF Offshore Blowout Database show 573 offshore blowouts or oil releases occurring worldwide since 1955, similarly suggesting that incidents are not uncommon.

We can thus conclude that the recurrence rate for a major oil spill from an offshore blowout in Europe is in the order of decades rather than centuries. What are the costs associated to this in terms of property losses, pollution clean up, health effect, lost revenue for the tourism or the fishing industry?

Finally, from what I understand the petroleum in Abruzzo is of low quality (requiring an inefficient and polluting refinement process) and the reserves constitute a minuscule part of Italy's oil consumption. It would be irresponsible to sacrifice the environment by permitting oil exploration and extraction in Abruzzo and allow the few in corporations to make a quick profit at the expense of the natural environment that is clearly better suited for tourism, residences, or agriculture.

Sincerely,

Tom Chou  
Professor of Biomathematics and Mathematics  
David Geffen School of Medicine  
University of California, Los Angeles  
Los Angeles, CA 90095-1766

The LITUS FOUNDATION  
GLOBAL WARMING MITIGATION & ADAPTATION

Ministero dell'Ambiente  
Direzione per la Salvaguardia Ambientale del Ministero dell'Ambiente e della Tutela del Mare  
Divisione IV  
Attenzione: Concessione Elsa2 Petroceltic BR 268 RG  
Via Cristoforo Colombo 44 - 00147 Roma

Dear representatives of the Italian government:

The nonprofit 501(c)(3) Litus Foundation was formed to help reduce and adapt to the most serious threat to our present and future wellbeing: global climate change. Additionally, a small part of our resources will provide support for the sciences and arts.

We must cut CO<sub>2</sub> emissions as drastically and quickly as possible. There is much we can do immediately and Litus is helping create energy efficiency technologies. Our first project is developing extreme efficiency commercial uncooled engines, for all applications and fuels. None exist now. For the last 130 years, every time an engine has been run, 30% to 50% of fuel energy has been dissipated by water-or air-based cooling systems and general radiation. Can we afford this waste?

Uncooled engines would use *half* the fuel and so produce *half* the CO<sub>2</sub> of today's engines. They will be two to ten *times* smaller and lighter, virtually silent and more reliable (there is also no cooling system to fail). Once the first long-life products are successfully tested, the world will switch from cooled to uncooled engines within fifteen years, reducing all man-made CO<sub>2</sub> by 25% to 35%. This is probably the single biggest and quickest way to dramatically slow climate change.

However, for progress to come about, we need to stop the extraction of fossil fuels and give renewables and alternative technologies a chance.

We are writing to recommend that authorization be denied to the drilling permit BR 268 RG off the coast of Abruzzo, as filed to your offices by Dublin based Petroceltic. The "Elsa 2" permit is located only 7 kilometers from shore, between Ortona and Francavilla a Mare, flanked by two natural regional reserves - Punta dell'Acquabella and Ripari di Giobbe -- and in close proximity to the protected areas of Punta Aderci, Grotta delle Farfalle, Lecceta di Torino di Sangro. Elsa 2 is the first of at least ten new leases in the central Adriatic that Petroceltic owns. If approved, this exploratory well could turn into a permanent drilling operation and be followed by a slew of other leases, similarly close to shore. In many ways we are worried that this project would morph into a novel Ombrina Mare, requiring an FPSO desulfurizing unit and a series of pipelines for extracting and treating heavy sour oil.

Offshore drilling has negative effects on marine life, coastal communities and on the health of residents. Drilling muds, brine wastes and produced waters are daily disposed of at sea while deck runoff water and pipeline leaks are common problems. As a result, either voluntarily or by accident, offshore rigs dump into the water tons of drilling fluids, metal cuttings and toxic metals that contain lead, chromium, mercury and benzene, which is carcinogenic. At times, catastrophic spills and blowouts may occur extolling heavy damages to the environment, to people, to local economic activities such as fishing and tourism. The case of Elsa is particularly disturbing due not only due to its proximity to shore and the effects of oil on the ecosystem, but also because it sets a perilous path for the very essence of Abruzzo, whose economy is based on tourism, fishing and agriculture. The entire coastal area where Petroceltic intends to drill, is soon to become a National Park, and is known for its rough beauty and pristine waters. Several beaches in the area employ many people in recreational activities and local small businesses depend on a healthy coast as the foundation for their livelihood. People visit Abruzzo to experience nature and to engage in recreational fishing and surfing, not to see oil platforms. Offshore exploration is misguided and presents significant risks to the future of Abruzzo's economy.

From a larger point of view, our climate is quickly changing in fast, unpredictable ways disrupting entire eco-systems. The primary cause of these changes is the use of fossil fuels: we cannot afford to keep the status quo. Instead of drilling Elsa 2, Italy should be one of the world's leaders in renewable energy due to its geographical position and its abundant solar and wind resources. Abruzzo, blessed by such natural beauty, should stay green, fossil-fuel free and healthy for present and future generations.

Finally, I urge Italian officials to promote a dialogue with other countries that share borders with the Adriatic, and that together Italy, Croatia, Slovenia and Albania, may find a constructive resolution to ban offshore drilling within the entire Adriatic Sea, to save its shores, its marine life and its biodiversity for future generations.

The Litus Foundation

Mitja Hendrics, Founder

1015 Gayley Avenue, Suite 1228

Los Angeles, CA 90024 (USA)



Ministero dell' Ambiente

Direzione Salvaguardia Ambientale del Ministero dell' Ambiente e della Tutela del Mare, Divisione IV

Attenzione: Concessione BR 268 RG Petroceltic

Via Cristoforo Colombo 44 - 00147 Roma

Los Angeles, Sept 24<sup>th</sup> 2014

Dear Representatives of the Italian government:

We are a non-profit organization concerned with preventing hydraulic fracturing from contaminating California waters, oceans and land. We are writing to recommend that authorization be denied to the drilling permit BR 268 RG off the coast of Abruzzo, as filed to your offices by Dublin based Petroceltic. The "Elsa 2" permit is located only 7 kilometers from shore, between Ortona and Francavilla a Mare, flanked by two natural regional reserves – Punta dell'Acquabella and Ripari di Giobbe -- and in close proximity to the protected areas of Punta Aderci, Grotta delle Farfalle, Lecceta di Torino di Sangro. Elsa 2 is the first of at least ten new leases in the central Adriatic that Petroceltic owns. If approved, this exploratory well could turn into a permanent drilling operation and be followed by a slew of other leases, similarly close to shore. In many ways we are worried that this project would morph into a novel Ombrina Mare, requiring an FPSO desulfurizing unit and a series of pipelines for extracting and treating heavy sour oil.

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Thank you,

Jeanne Marie Kreuzer

And the staff at Stop Fracking California State



ARCHITECTURE | URBAN PLANNING | DESIGN RESEARCH

Ministero dell' Ambiente  
Direzione Salvaguardia Ambientale del Ministero dell' Ambiente e della Tutela del Mare, Divisione IV  
Attenzione: Concessione BR 268 RG Petroceltic  
Via Cristoforo Colombo 44 - 00147 Roma

Dear Representatives of the Italian government:

We are an architectural firm specializing in renewable energy with offices in California and in Germany. We are writing to recommend that authorization be denied to the drilling permit BR 268 RG off the coast of Abruzzo, as filed to your offices by Dublin based Petroceltic. The "Elsa 2" permit is located only 7 kilometers from shore, between Ortona and Francavilla a Mare, flanked by two natural regional reserves – Punta dell'Acquabella and Ripari di Giobbe -- and in close proximity to the protected areas of Punta Aderci, Grotta delle Farfalle, Lecceta di Torino di Sangro. Elsa 2 is the first of at least ten new leases in the central Adriatic that Petroceltic owns. If approved, this exploratory well could turn into a permanent drilling operation and be followed by a slew of other leases, similarly close to shore. In many ways we are worried that this project would morph into a novel Ombrina Mare, requiring an FPSO desulfurizing unit and a series of pipelines for extracting and treating heavy sour oil.

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Thank you,

Steffen Leisner, Principal

SYNTAX – design practice and architectural research lab

Konigsberger Strasse 37

71638 Ludwigsburg

Deutschland

September 25<sup>th</sup> 2014