



COMITATO CITTADINO PER LA BONIFICA MARINA  
A TUTELA DEL DIRITTO ALLA SALUTE E ALL'AMBIENTE SALUBRE  
Via Federico Campanella n. 50 – MOLFETTA (BA) [cbm.molfetta@libero.it](mailto:cbm.molfetta@libero.it)  
COORDINAMENTO NOTRIV TERRA DI BARI [notriv.terradibari@gmail.com](mailto:notriv.terradibari@gmail.com)  
COORDINAMENTO NO TRIV BASILICATA [francesc.masi@tiscali.it](mailto:francesc.masi@tiscali.it)

Attention: **Mrs Ljiljana Maksimović**

Ministry of Economy

[info@mek.gov.me](mailto:info@mek.gov.me)

Rimski trg 46

81000 Podgorica

Montenegro

**Dott. Mariano Grillo**

Direzione Generale per le Valutazioni Ambientali

Divisione II Sistemi di Valutazione Ambientale

Ministero dell'Ambiente, della Tutela del Territorio e del Mare

[DGSalvanguardia.Ambientale@PEC.minambiente.it](mailto:DGSalvanguardia.Ambientale@PEC.minambiente.it)

Via Cristoforo Colombo 44

00147 Roma

**Subject: Comments on Public Consultations for the Draft Report of the Strategic Environmental Impact Assessment for the Program of Exploration and Production of Hydrocarbons Offshore Montenegro. Request for project rejection.**

The undersigned Matteo d'Ingeo, as President-spokesman for the " **Comitato cittadino per la Bonifica marina a tutela del diritto alla salute e all'ambiente salubre**" (Citizens' Committee for Marine Reclamation to protect the right to public health and a healthy environment), hereinafter referred to **Comitato Bonifica Molfetta (CBM)**, recorded April 3, 2014 with the N. 8987/3, with headquarters in Via F. Campanella, 50, Molfetta (Ba), having as a statutory objective "the protection of the right to public health and a healthy environment", Rosanna Rizzi, on behalf of the "**Coordinamento NoTriv Terra di Bari**" and Francesco Masi on behalf of the "**Coordinamento No Triv Basilicata**" state as follows.

**Given that,**

- The Ministry of Economy, Government of Montenegro, published on 7th of August, 2013 the First Round for the Production Concession Contract, under the Law on Exploration and Production of Hydrocarbons, at the Official Gazette of Montenegro, no. 39/2013.

The Deadline for submission of applications/bids expired on 28th February 2014 at 15:00 (UTC + 01).

The First Round includes 13 blocks in the Adriatic Sea covering an area of 3,191 sq km.

<http://www.petroleum.me/>

- On 18 January 2016, the Ministry of Sustainable Development and Tourism of Montenegro asked Italy to express its interest in participating in "**Public Consultations for the Draft Report of the Strategic Environmental Impact Assessment for the Program of Exploration and Production of Hydrocarbons Offshore Montenegro**" as required by Directive 2001/42 / EC and the SEA Protocol to the Espoo Convention on environmental impact assessment in a trans-boundary context (signed in Kiev in 2003);

-The Government of Montenegro asked to receive comments to the draft program, the Environmental Report and the non-technical summary published on the website of the Ministry of Economy of Montenegro by 15 February;

- In a note dated 22 January 2016 Italy expressed interest in participating in cross-border consultations to the Montenegro authorities, asking at the same time, to encourage public consultation in Italy, to receive an Italian language version of the non-technical summary and an extension of time for submission of their comments

- The Program of Exploration and Production of Hydrocarbons Offshore that Government of Montenegro issued refers to the research and production of hydrocarbons that are found in the subsoil of the internal sea waters or the territorial sea of Montenegro, or in the subsoil of the continental shelf in the Adriatic Sea within the line of demarcation with neighboring countries, over which Montenegro, in accordance with international law, exercises jurisdiction and sovereignty;

- The Program of Exploration and Production of Hydrocarbons Offshore Montenegro includes part of the continental shelf and territorial waters of Montenegro, for a surface of 3,191 sq km, where 13 blocks are located. The coordinates of blocks are listed in the "Decision on Defining Blocks for Award of Concession Contract for Production of Hydrocarbons in Offshore Montenegro" in the "Official Gazette of Montenegro 42/12 of 31 July 2012":

[http://www.petroleum.me/fajlovi/petroleum/editor\\_fajlovi/Decision\\_on\\_Defining\\_Blocks\\_for\\_Award\\_of\\_Concession\\_Contract\\_for\\_Production\\_of\\_Hydrocarbons\\_in\\_Offshore\\_Monten.pdf](http://www.petroleum.me/fajlovi/petroleum/editor_fajlovi/Decision_on_Defining_Blocks_for_Award_of_Concession_Contract_for_Production_of_Hydrocarbons_in_Offshore_Monten.pdf).

The size of each search site varies from 1,5 to 6,1 sq km. The eastern border of the area subject to concession is a line varying in distance from 2 to 5 km from the coastline. The remaining boundaries of the concession area are established in accordance with international agreements with neighboring states. The most southwesterly point of block 8 is about 120 km from the coast of Apulia Region.

- During the research period, activities such as the execution of 2D and 3D seismic surveys and exploratory drilling will take place, as well as numerous case studies with the purpose of collecting geological and geophysical data to assess the presence of potential hydrocarbons and ascertain the geological structures as accurately as possible.

### **Considering that**

- On **28.07.2014** the **Comitato Bonifica Molfetta (CBM)**, in the person of its President, forwarded [comments](#) to the **Global Petroleum Company, which documented interference between ordnance unexploded dumping sites and hydrocarbon extraction blocks**. These observations are fully confirmed.

- On **11.03.2015** the **Comitato Bonifica Molfetta (CBM)** and **Coordinamento NoTriv Terra di Bari** sent [additions to the observations](#) of the Global Petroleum Company to the Ministry of the Environment which have been confirmed in full;

- On **19.04.2015** the **Comitato Bonifica Molfetta (CBM)** and **Coordinamento NoTriv Terra di Bari** sent [comments](#) to the **Cross-boundary Consultations for the Plan and Framework Programme for Research and production of hydrocarbons in the Republic of Croatia in the Adriatic**, reiterating the need to investigate the possible risks related to the use of Air Gun, and to future drilling in the presence of unexploded ordnance with chemical content from both the Second World War and the recent conflict in the Balkans, which are confirmed in full.

### **In light of the above, the Comitato Bonifica Molfetta (CBM) e il Coordinamento NoTriv Terra di Bari wish to highlight that**

- **Annex 1 Fig. 1** clearly shows that the **blocks 8 and 9** of the Program of Exploration and Production of Hydrocarbons Offshore Montenegro fall partly in an area indicated by charts and vessels as **unexploded ordnance dumping site**, as reported on the "MAP OF ORDNANCE UNEXPLODED DUMPING SITES IN THE SOUTHERN ADRIATIC SEA - R.E.D.C.O.D. project (*Research on Environmental Damage caused by Chemical Ordnance Dumped at sea*) co-funded by the European Commission (action B4-3070 / 2003/368585 / SUB / D.3)).

- Similar feedback is found relating to **blocks 1, 2, 6, 7, 10** overlapping the Nautical Chart n. 186 of The United Kingdom Hydrographic Office "*Bar and Vlore to Brindisi to Vieste*", scale 1:300,000, with updates of sailors reports to 2008 (see Fig. 2 Ann. 1).
- The geophysical prospecting techniques to be carried out with the use of Air-Guns and the like, for future provisional and definitive drilling wells, have probably never been correlated with the thousands of unexploded ordnance which have sunk in the areas under survey as well as other neighboring areas. It is also probable that no account has been taken by the applicant companies of their possible synergistic and cumulative effects on explosive devices of both chemical and conventional nature, or of the effect of seismic waves produced by Air-Gun trials for future drilling; and that there has been no mapping, prospecting or geo-referencing of unexploded ordnance present in that vast overlapping area or bordering it, not only regarding the survey areas affected by today's requirements, but also other areas. Therefore, **we wish to urgently communicate these findings to the Italian authorities, to the Italian Ministry and the Montenegrin Ministry, with the aim of stopping the processing of concessions of the blocks and thus the consequent start of explorations and surveys until the respective Ministries of Defense, Environment and Economic Development in cooperation with military bodies have not verified the danger created by the presence of explosive war remnants in all areas and in all the sub-areas impacted by investigative activities involved with the search for hydrocarbons;**
- **February 16, 2015:** a complaint to the prosecutor in Pesaro in July 2014 was published in "*Il Resto del Carlino*" by the President of the "Coordinamento Nazionale Bonifica Armi Chimiche" (National Coordination Reclamation Chemical Weapons) (**Annex no. 2**) indicating the presence off the coast of Pesaro of thousands of chemical bombs loaded with arsenic and mustard gas, sunk by the Sonderkommando Meyer under the orders of Hitler in the summer of 1944 (**Annex no. 3**); More informations about this document is are reported in the book "*Veleni di Stato*" (Poisons State) edited by Gianluca Di Feo.
- Unfortunately **the problem of the presence of unexploded bombs** affects the whole basin of the Adriatic Sea and thus all instances of prospecting for hydrocarbons presented by all applicant companies even beyond Italian borders. The ministries concerned in the countries bordering on the Adriatic Sea must necessarily take this cumbersome and dangerous presence into account.

Moreover, referring to the **Strategic Environmental Impact Assessment (SEA) of hydrocarbons exploration and production activities in the offshore Montenegro** and **NON-TECHNICAL SUMMARY** (<http://www.mek.gov.me/ResourceManager/FileDownload.aspx?rId=225188&rType=2>) of the Program it is also pointed out that:

In the NON-TECHNICAL SUMMARY, **Montenegro** is described as "[...] a leading country in environmental awareness. In 1991 deputies of the Parliament of Montenegro decided to do something that no other state had ever considered, which was to declare **Montenegro the world's first ecological state**. This declaration was stipulated in the country's constitution in 1994. Article 1 "STATE" stipulates that **Montenegro is a democratic, social and ecological state**. The latest Constitution adopted in 2007 stipulates in Article 1 that Montenegro is a civil, democratic, ecological state of social justice, based on the rule of law [...]".

Despite intentions of following the **Norwegian model**, whereby most of the revenues coming from oil and gas extraction activities must be deposited in a special fund (sovereign fund) to be used for the needs of future generations, with the remainder given over to current development by supporting priority sectors in Montenegro, such as tourism and environmental protection, **no account has been taken of the impact of accidents at wells or platforms in a closed basin such as the Adriatic Sea**.

It is known that the use of Air-Guns for geo-seismic exploration can cause **damage and behavioral alterations which are sometimes fatal**, in very different marine species, **particularly Cetaceans**, at up to several kilometers distance (ref. ISPRA Technical report "*Valutazione e mitigazione dell'impatto acustico dovuto alle prospezioni geofisiche nei mari italiani*" (Rating and acoustic impact mitigation due to geophysical prospecting in the Italian seas) by Bertolini S., Borsani JF., Curcuruto S., De Rinaldis L., Farchi C., 2012).

The proposal to signal the beginning of such practices to resident or transitory Cetaceans by using low power (the so-called "soft-start") would only confuse the animals rather than act as a clear starting signal.

Although **Figure 8 of NON-TECHNICAL SUMMARY** shows the presence of Cetaceans in the area subject to exploration projects, no maps are provided of the overlaps between the prospective blocks and the presence of

the Cetaceans themselves. In addition **no information is given highlighting the interference of prospecting routes with those of Cetaceans or of any possible escape routes in case of a meeting between them.**

As reported in the study "**Possibili effetti sui Cetacei derivanti dalle attività di prospezione geologica per la ricerca idrocarburi in mare e dalle eventuali successive fasi di trivellazione**" (Possible effects on Cetaceans resulting from geological prospecting for oil at sea search and any subsequent phases of drilling) the **Jonian Dolphin Conservation** of Taranto (<http://www.joniodolphin.it/wordpress/wp-content/uploads/2013/12/CETACEI.pdf>), "any drilling activities, the construction of a temporary or permanent platform, as well as the extraction activities, storage and transport of hydrocarbons, that normally follow the first phase of exploration, individually represent factors which have important acoustic and chemical impacts on the ecosystem. The Cetaceans may, in fact, be exposed to different chemical molecules present in the hydrocarbon complex (or used to treat oil spills as dispersants) by direct inhalation or ingestion or absorption through the consumption of contaminated preys. In addition, hydrocarbons can cause skin and eye irritation in Cetaceans, burning of mucous membranes of the eyes and mouth, and increased susceptibility to infection. Finally, for large Cetaceans, the dispersed oil can pollute the baleen they use to filter water and retain food, so potentially can decrease their ability to take food".

The possibility of **intercepting a deposit of weapons** was not considered as **a possible accident**, nor were the risks evaluated or the consequences discussed. Thus, actions to take immediately, the nature of long term cleaning up processes for the restoration of a pristine area, as well as the impact on marine life and entire ecosystem of the Adriatic Sea, were ignored.

For these reasons, the **C.B.M. Molfetta, Coordinamento NoTriv Terra di Bari and Coordinamento No Triv Basilicata ask to Ministry of Economy of Montenegro to reject the "Program of Exploration and Production of Hydrocarbons Offshore Montenegro".**

**This request for dismissal** is also based on the lack of any proposed mapping, prospecting and geo-referencing of unexploded ordnance present in a wide overlapping or bordering area, not only within the survey areas affected by today's requirements, but also within the others present in the Adriatic Sea.

**Molfetta, 08.02.2016**

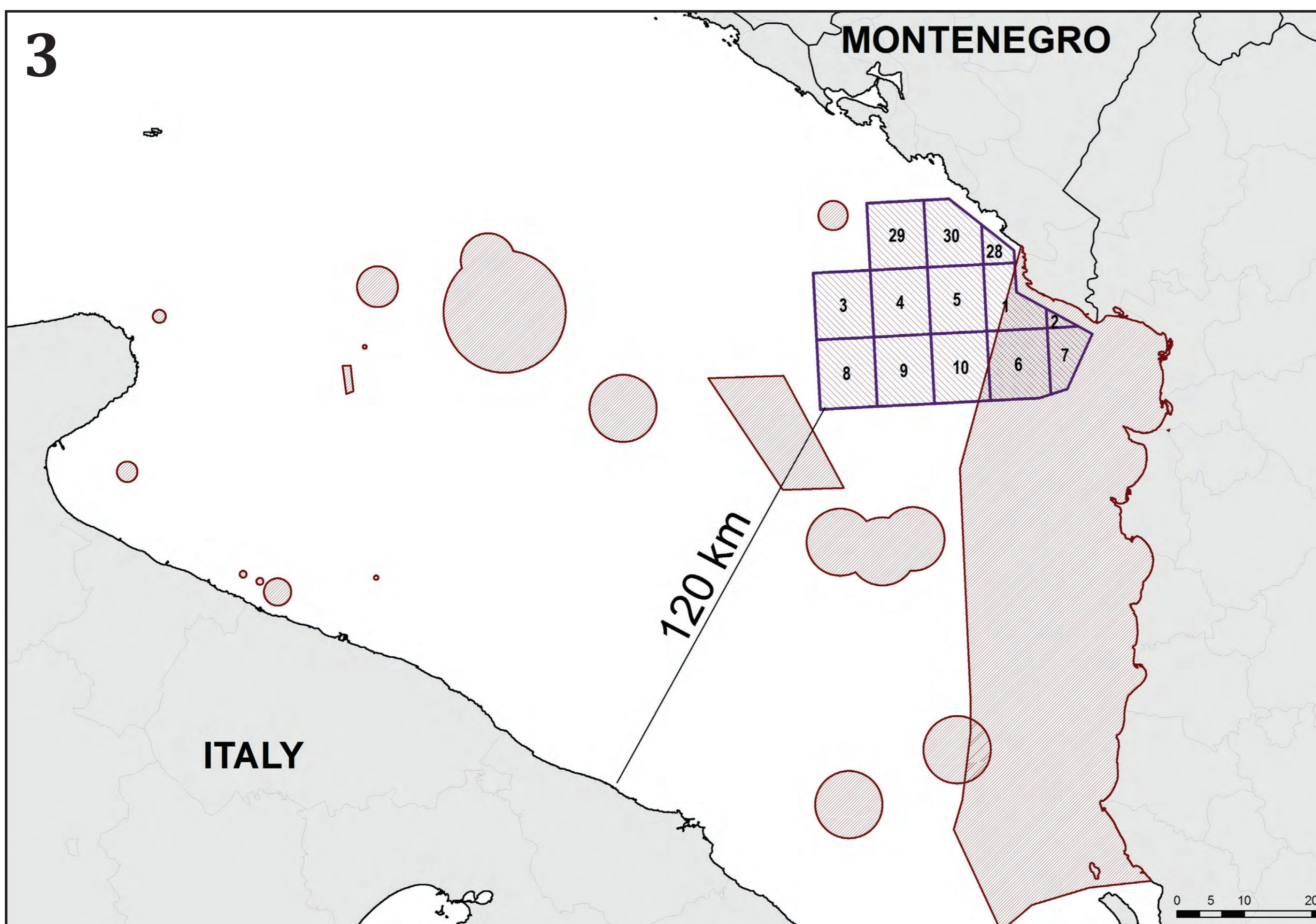
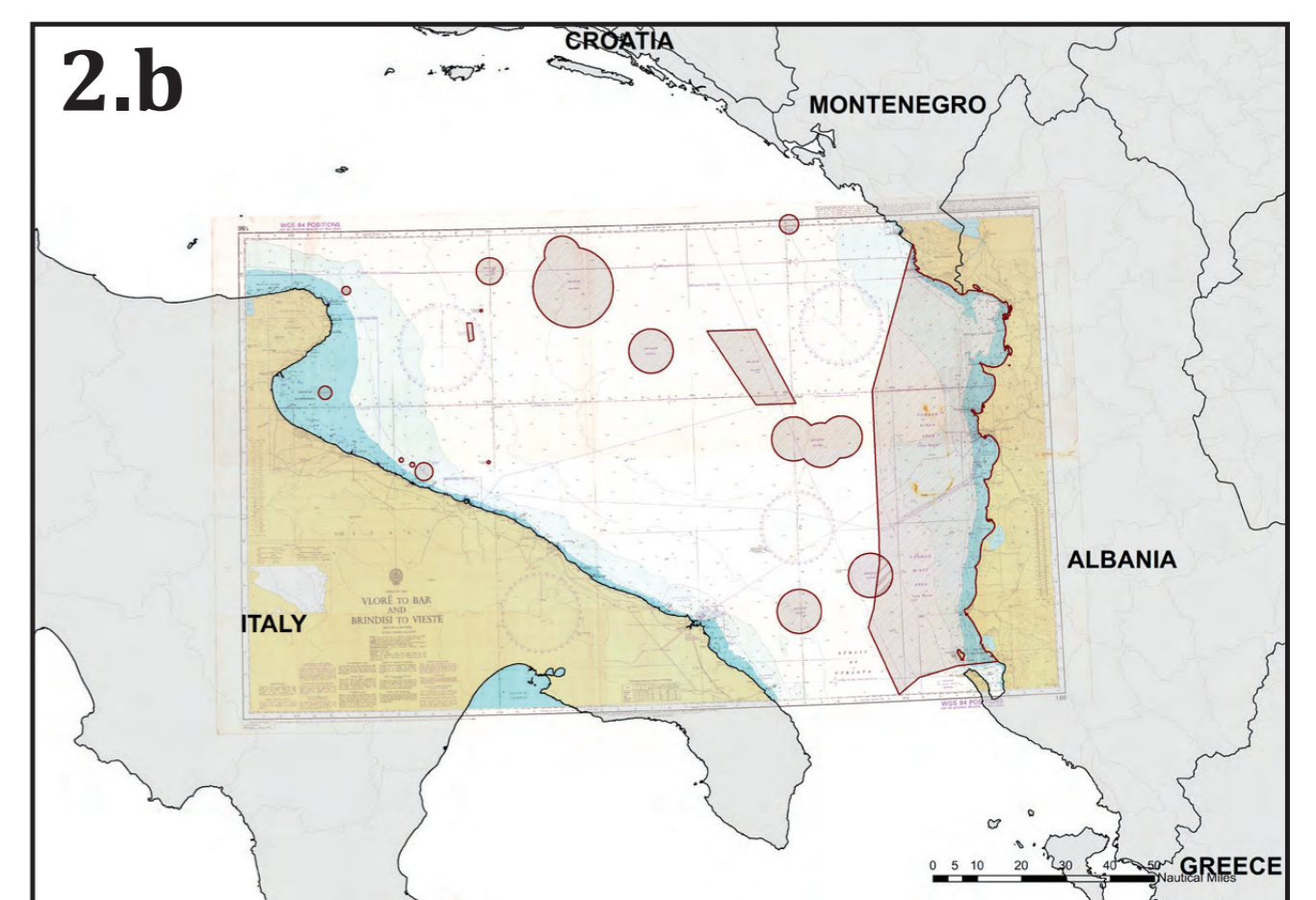
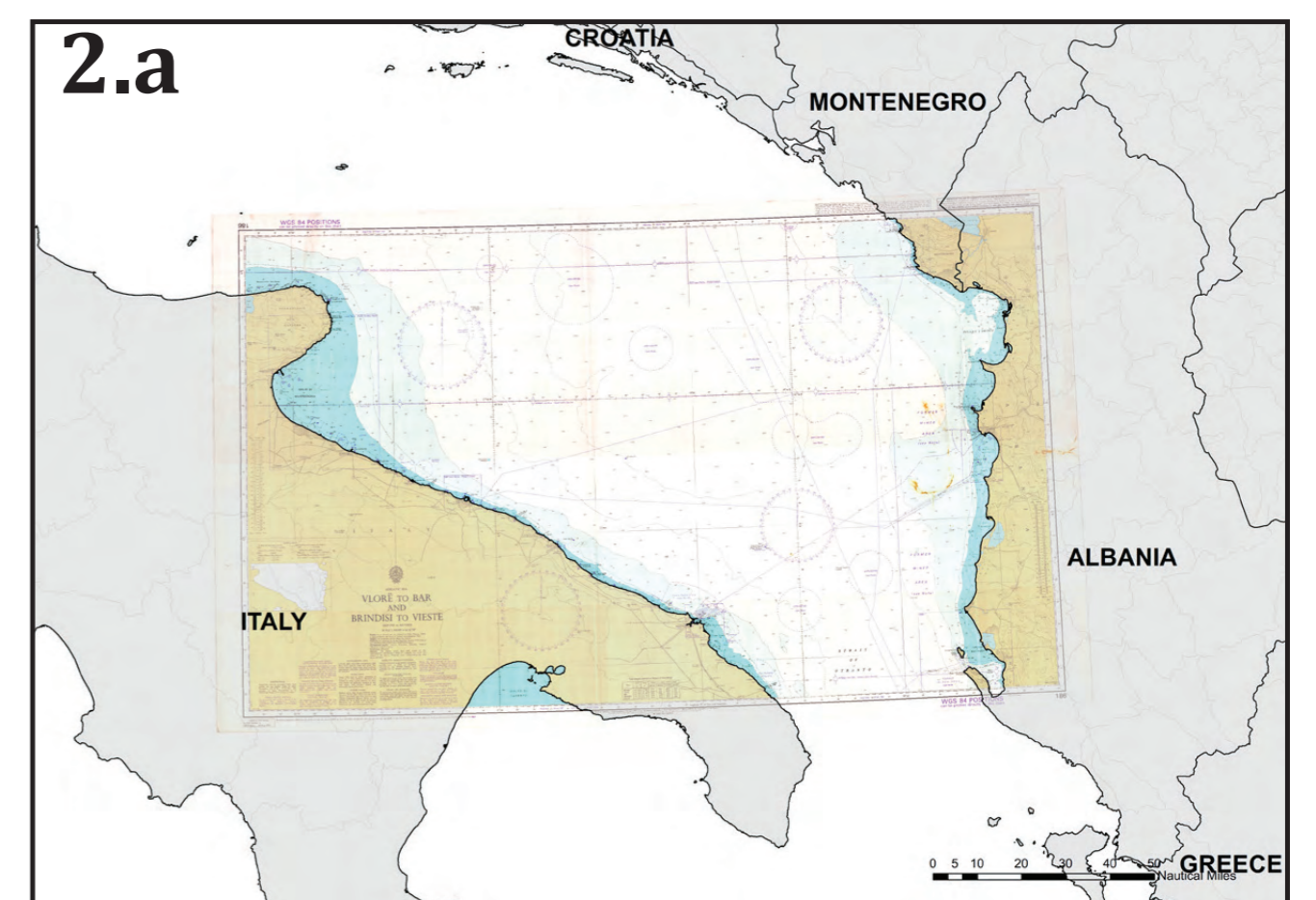
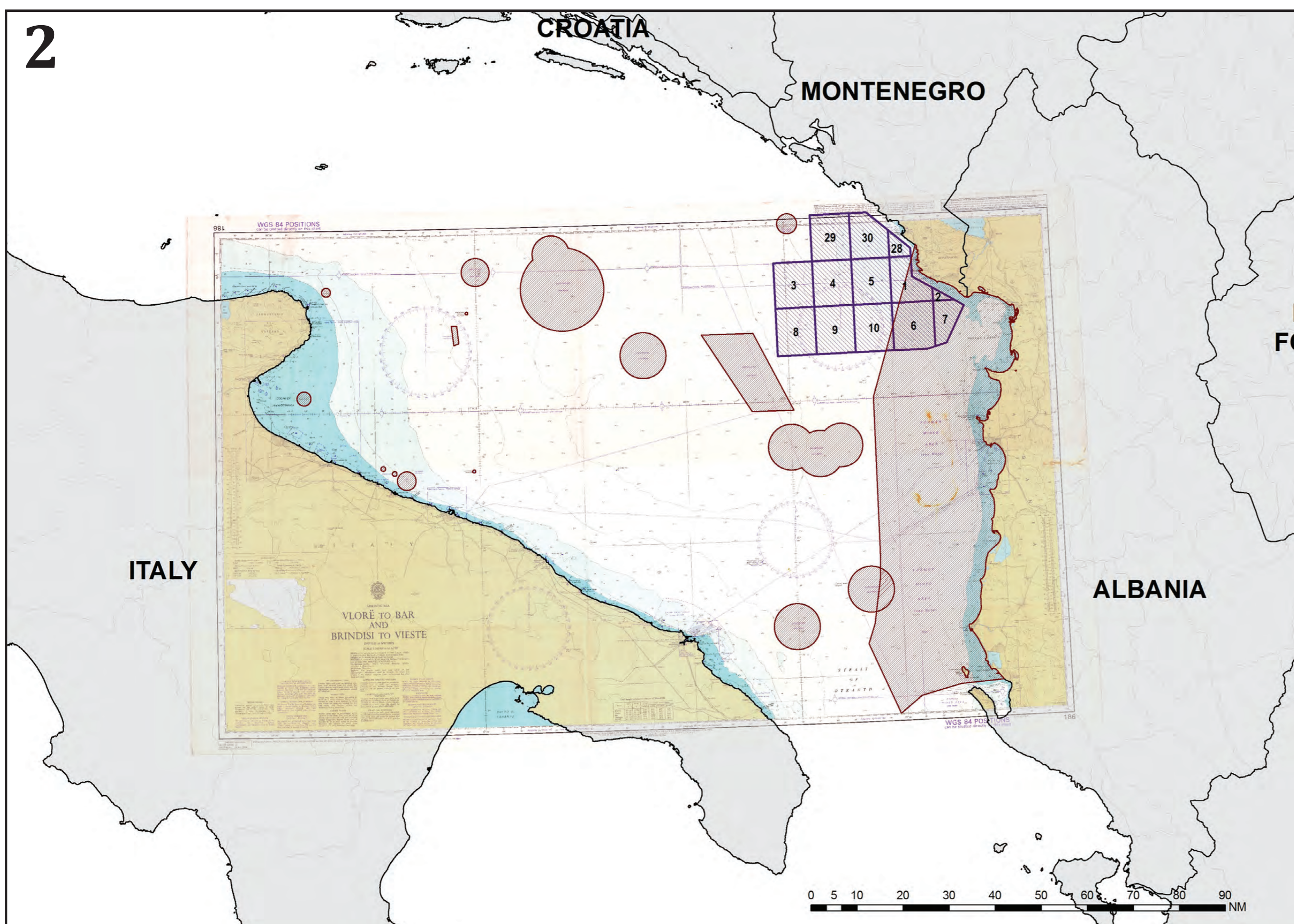
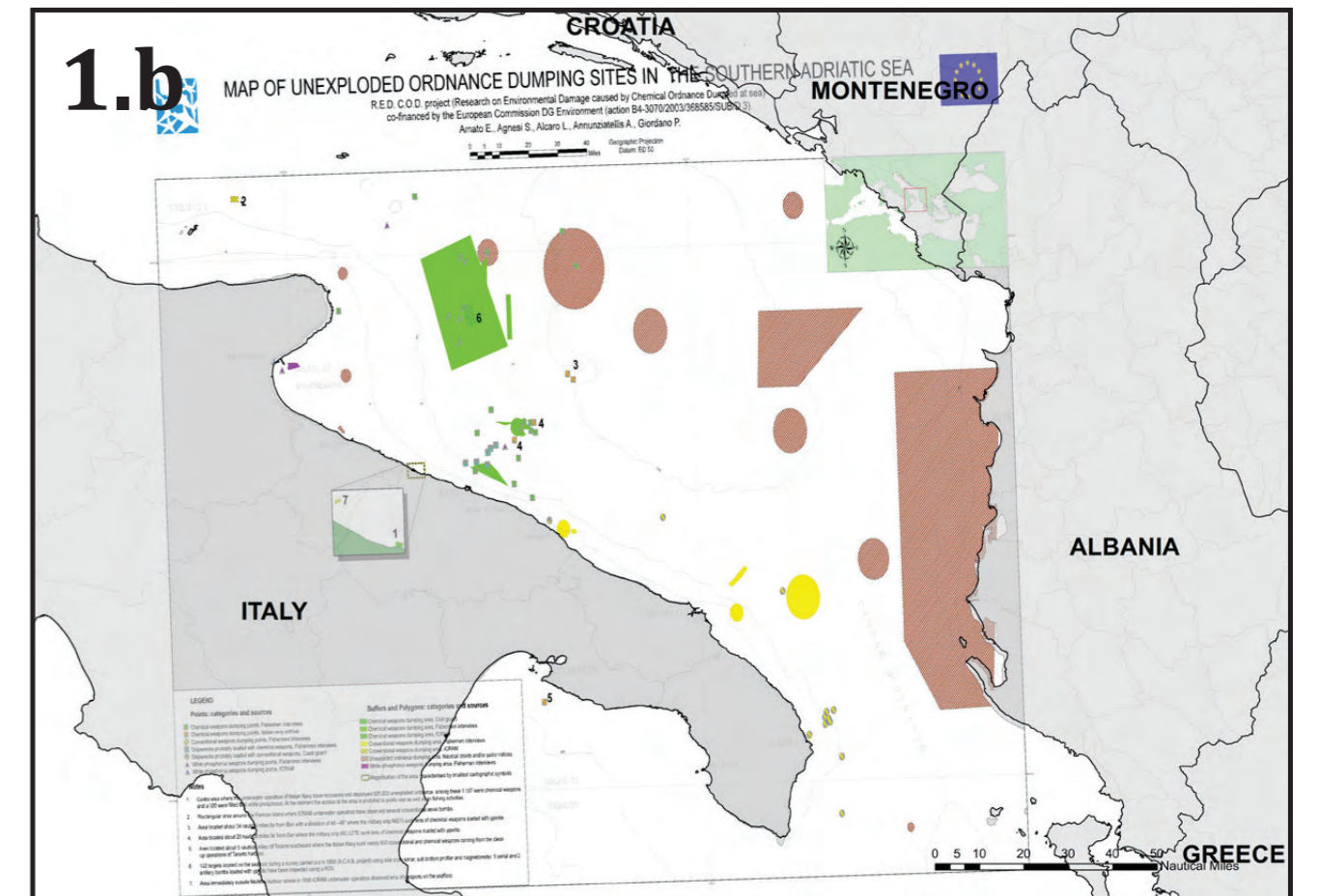
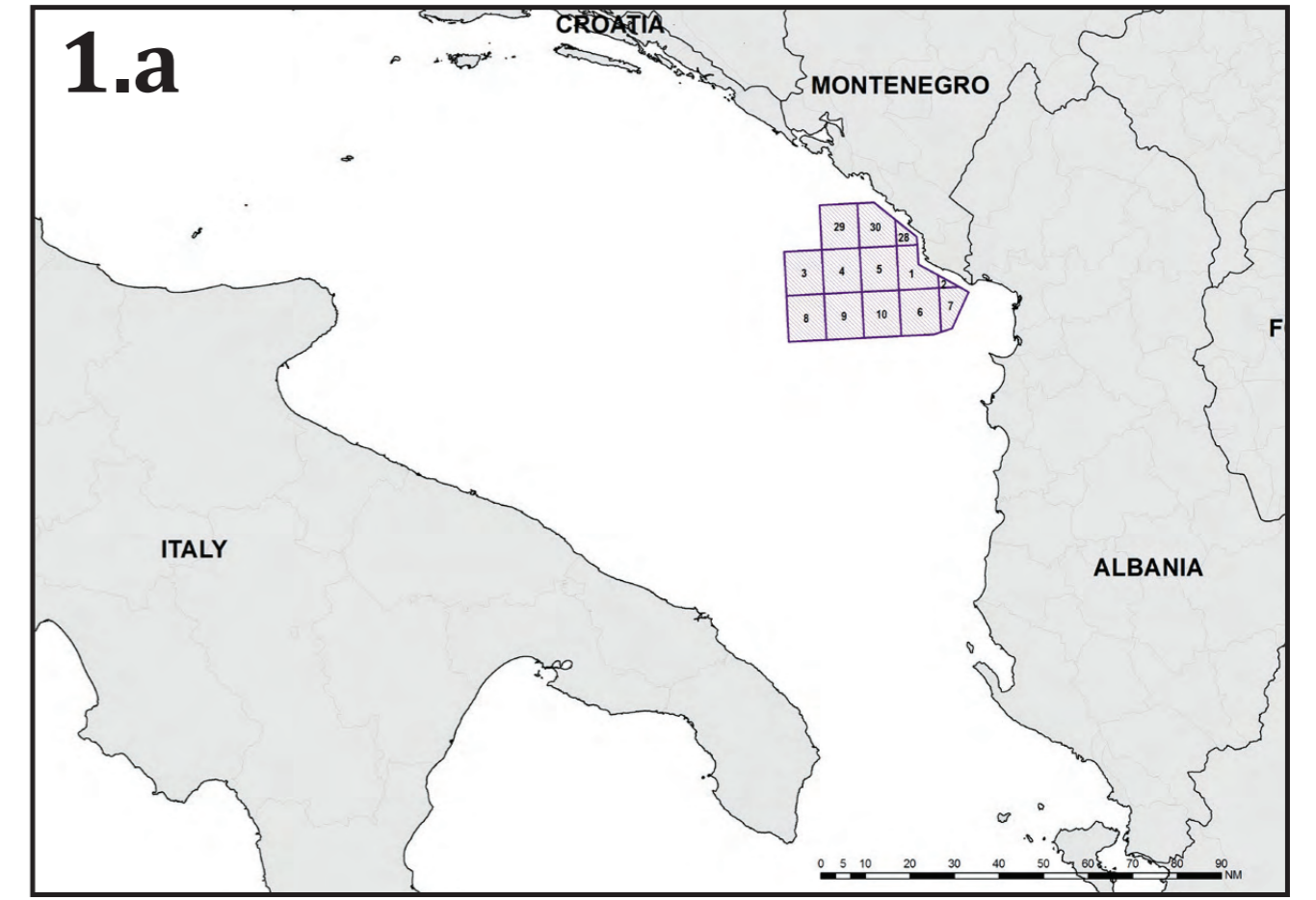
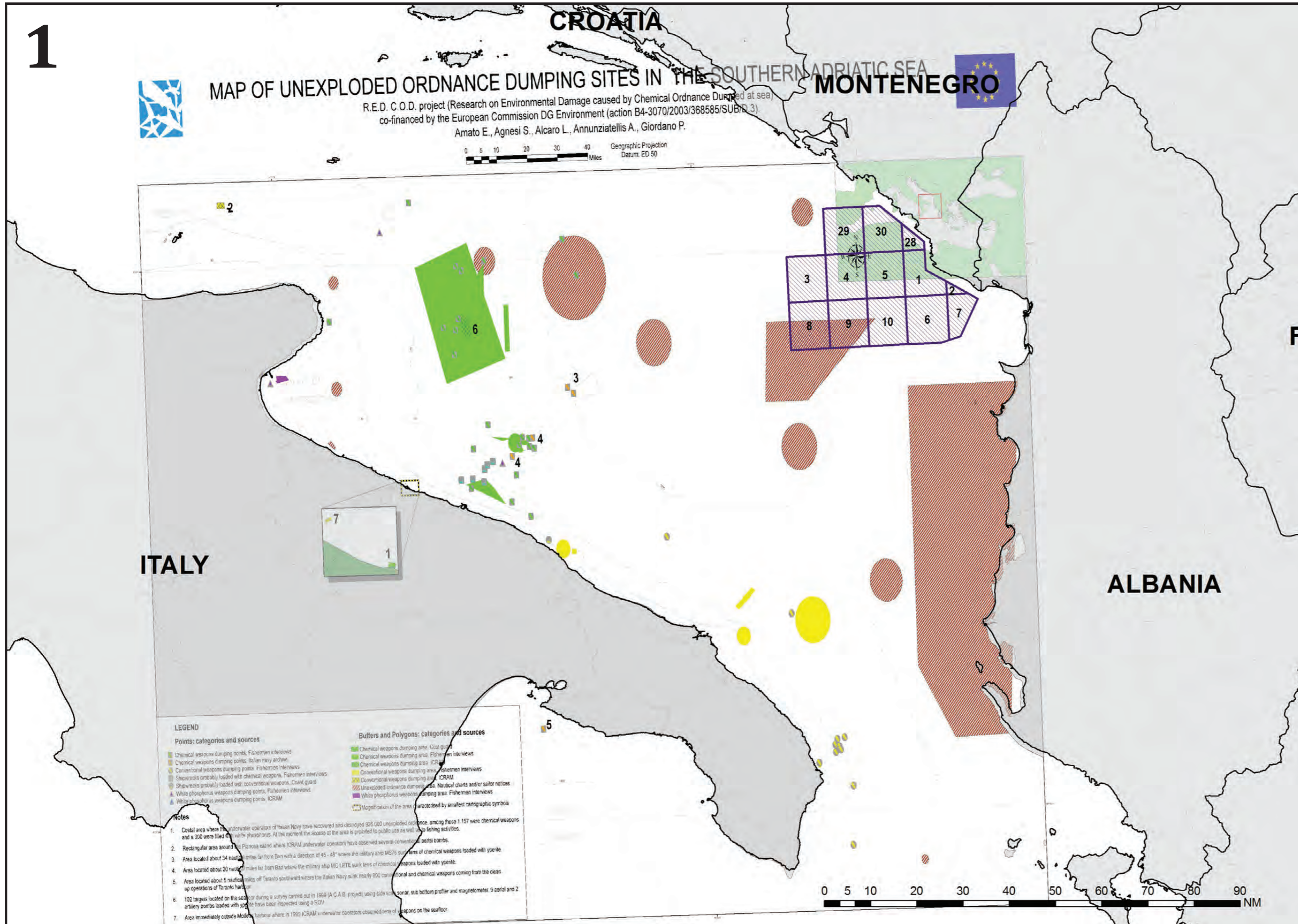
for "**Comitato Bonifica Molfetta**"  
Matteo d'Ingeo

for "**Coordinamento NoTriv Terra di Bari**"  
Rosanna Rizzi

for "**Coordinamento No Triv Basilicata**"  
Francesco Masi

Address for correspondence: Matteo d'Ingeo - Via Quintino Sella, 13 - 70056 Molfetta (Bari) - Italy  
[cbm.molfetta@libero.it](mailto:cbm.molfetta@libero.it) - [mattingo@libero.it](mailto:mattingo@libero.it)  
[rosanna.rizzi@archiworldpec.it](mailto:rosanna.rizzi@archiworldpec.it) - [notriv.terradibari@gmail.com](mailto:notriv.terradibari@gmail.com)  
[francesc.masi@tiscali.it](mailto:francesc.masi@tiscali.it)

# Annex 1 - Public Consultations for the Draft Report of the Strategic Environmental Impact Assessment for the Program of Exploration and Production of Hydrocarbons Offshore Montenegro



**Public Consultations for the Draft Report of the Strategic Environmental Impact Assessment for the Program of Exploration and Production of Hydrocarbons Offshore Montenegro**

**Fig. 1**  
 Overlapping between polygons of blocks of the Program of Exploration and Production of Hydrocarbons Offshore Montenegro (Fig. 1.a - source: NON-TECHNICAL SUMMARY SEA\_Rev E\_NTS\_10072015.pdf) and MAP OF ORDNANCE UNEXPLODED DUMPING SITES IN THE SOUTHERN ADRIATIC SEA - R.E.D.C.O.D. project (Research on Environmental Damage caused by Chemical Ordnance Dumped at sea) co-funded by the European Commission (action B4-3070 / 2003/368585 / SUB / D.3).

**Fig. 2**  
 Overlapping of Fig. 1.a and dumping sites as reported by the Nautical Chart n. 186 of The United Kingdom Hydrographic Office "Bar and Vlore to Brindisi to Vieste", scale 1:300,000, (with updates of sailors reports to 2008 (Fig. 2.a and 2.b - source: <http://www.ukho.gov.uk/>);

**Fig. 3**  
**IN RED**  
 Ordnance Unexploded Dumping Sites (as reported on Fig. 2.a)

**IN BLUE**  
 Blocks 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 28, 29, 30 of the Program of Exploration and Production of Hydrocarbons Offshore Montenegro as reported on website of Ministry of Economy del Montenegro and Oil&Gas Montenegro website (fonti: <http://www.mek.gov.me/> e <http://www.petroleum.me>)

Maps edited by Rosanna Rizzi

# Bombe in mare, trovate le prove «Lo ordinò Hitler: adesso cercatele»

## Documento della Luftwaffe dimostra che furono gettate a Pesaro

Francesca Pedini  
PESARO

**UN DOCUMENTO** agghiacciante, proveniente dall'archivio della Luftwaffe (l'aviazione militare tedesca) mette un punto fermo sul caso delle bombe chimiche sepolte davanti alle coste adriatiche. A mostrarlo ufficialmente, dopo averlo consegnato alla Procura della Repubblica, è il professor Alessandro Lelli, presidente del Coordinamento nazionale bonifica armi chimiche, che ora vuole partire da qui per dimostrare l'ina-

### INDAGINI

**Il professor Lelli, che si batte per svelare il mistero, l'ha consegnato in Procura**



bissamento nel mare davanti a Pesaro di 1316 tonnellate di bombe all'iprite e 84 tonnellate di bombe all'arsenico. Provenivano dall'arsenale di Urbino e per ordine di Hitler furono smaltite nello specchio d'acqua compreso tra Pesaro e Gabicce. Nel documento storico, tratto da una sorta di diario di un comandante di nome Meyer, vengono descritte con toni glacianti tutte le operazioni, con un distacco che fa rabbrivire. Lo scritto è stato menzionato anche nel libro del giornalista Gianluca Di Feo 'Veleni di Stato', dalla cui indagine è partita la difficile battaglia per liberare i mari dalle armi chimiche inabissate.

**QUALE OBIETTIVO** si propone il Coordinamento con questa nuova mossa? Lo stesso di sempre, ovvero fare intervenire la Marina Militare per capire dove si trovino esattamente quelle bombe, e se rappresentino ancora un pericolo. Ma soprattutto farle rimuovere in sicurezza. «In base alle testimo-



nianze che abbiamo raccolto in questi anni - spiega il professor Lelli - le bombe chimiche dovrebbero trovarsi entro 3-4 miglia dalla costa, nell'area marina compresa tra Pesaro e Vallugola. Il problema è che tra i pescatori c'è la convinzione che essendo passato molto tempo, le bombe non siano più

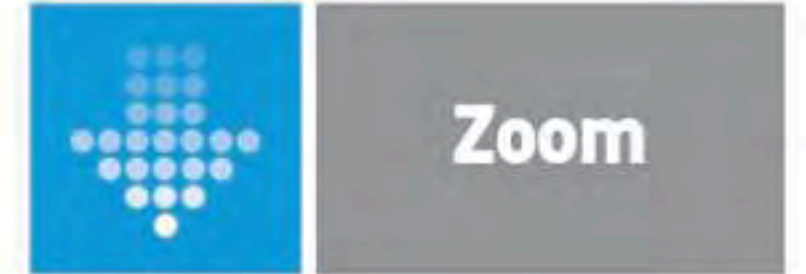
dannose. Ma noi non possiamo saperlo, e allora perché non indagare? I costi di un eventuale monitoraggio non ricadrebbero sui cittadini - sottolinea - ma sui ministeri competenti o potrebbero addirittura essere finanziati da fondi europei in base ad accordi internazionali». A mettere i bastoni tra le

**AL LAVORO**  
Alessandro Lelli, presidente del Coordinamento nazionale bonifica armi chimiche, mostra il documento dei tedeschi. In piccolo, Adolf Hitler

“Pericolose sì o no?”

«Non possiamo saperlo e allora perché non indagare?»

ruote al Coordinamento anche la cooperativa piccola pesca di Pesaro, che ha negato la presenza del pericolo. Ma contrariamente ai colleghi pesaresi, anziani pescatori della vicina Gabicce Mare hanno confermato ritrovamenti in mare di ordigni chimici, dichiarazioni registrate da una inchiesta



### La guerra

Durante la Seconda Guerra Mondiale, Hitler avrebbe ordinato al suo esercito in fuga di smaltire una serie di bombe buttandole in mare davanti alla costa di Pesaro

### Urbino

Si tratterebbe di 1316 tonnellate di bombe all'iprite e di 84 tonnellate di bombe all'arsenico provenienti dall'arsenale di Urbino

### I timori

Diversi cittadini si battono affinché sia fatta luce su questo mistero: chiedono di cercare le bombe e di verificare se sono o meno ancora pericolose

dell'Università di Urbino e pubblicate sul sito internet 'Veleni di Stato'.

«**CONFIDIAMO** che la Procura prenderà in esame al più presto il fascicolo - riprende il professor Lelli - e il nostro esposto, firmato da oltre 100 cittadini pesaresi. Certo, non è detto che l'indagine vada avanti, ma siamo fiduciosi». E a chi si oppone dicendo che il Governo ha risposto ad una lettera dell'ex sindaco di Pesaro Ceriscioli affermando che una bonifica era già stata fatta tra il 1945 e il 1949? «Replio che c'è un documento ufficiale del sottosegretario di Stato Tambroni del 20 novembre 1951, dunque postumo alla eventuale bonifica, che sulla base di numerosi incidenti sollecitava un intervento dando anche delle coordinate». Lelli, affiancato localmente da Italo Campagnoli e Niccolò Di Bella, conta di presentare - con l'aiuto di qualche parlamentare - entro un mese una nuova interrogazione parlamentare, che coinvolgerebbe per la prima volta il Governo Renzi.

**L'ACCORDO** FIRMATA UN'INTESA SU DIVERSI PUNTI CON LA REGIONE: «HANNO I MEZZI PER INTERVENIRE»

## E ora potrebbe arrivare un aiuto dalla Marina Militare

PESARO URBINO

**LA SOLUZIONE** al caso delle bombe potrebbe arrivare da un accordo di collaborazione firmato qualche giorno fa tra la Marina Militare e la Regione Marche. A siglarlo, l'ammiraglio Salvatore Ruzittu e l'assessore regionale Paola Giorgi. In sostanza si è creata una nuova cooperazione su tanti temi, compresi la salvaguardia ambientale, la sicurezza marittima, la tutela del territorio e del mare. Diverse le tematiche di interesse dell'accordo. «La Marina Militare esprime le proprie capacità ed impiega i propri uomini e mezzi su una gamma di attività ed operazioni che spaziano dal sociale,

all'umanitario, all'ambientale, allo scientifico - si legge in una nota - ed in tutti i settori d'interesse della collettività che unitamente alla funzione prettamente militare delineano le capacità dual-use in senso più ampio». «Proprio questo accordo potrebbe dare uno slancio fondamentale per l'intervento delle unità speciali della Marina anche davanti alle coste pesaresi - incalza il professor Alessandro Lelli, presidente del Coordinamento nazionale bonifica armi chimiche -. Del resto loro hanno tutte le competenze e i mezzi necessari per individuare dove sono insabbiate le bombe, e per la loro bonifica». A questo punto servirebbe che la politica locale intercedesse per sollecitare la Re-

gione. «E' il nostro auspicio - dice Lelli - anche se la massima collaborazione che ci era coi precedenti sindaci di Pesaro pare non abbia trovato una continuità». Come mai? «Non saprei - risponde -. Abbiamo chiesto un incontro con il sindaco Ricci e non siamo stati convocati. Ci hanno messo in contatto con l'assessore Briglia, che ci ha fatto sapere di aver inviato una lettera di chiarimento per le eventuali bonifiche del '45 - '49. Non ne abbiamo però ricevuto copia come è sempre accaduto con le precedenti amministrazioni. Eppure siamo i migliori interlocutori in questo ambito. Dispiace che non si voglia lavorare in sinergia».

Fra. Pe.



U.Ü., den 10.8.1944.

Abschliessender Taetigkeitsbericht des Sonderkommandos Meyer  
Urbino.

KTB. 31

Am 9.12.1943 erhielt ich vom Feldluftgankommando XXVIII den Befehl, das K-Lager Urbino als Kommandant zu uebernehmen.

Am 17.12.1943 kam Befehl (Koflug 2/VI 345/43 g.Kdos.) den in Faessern lagernden Kampfstoff nach Anweisung des Reg. Baurat Dr. Jakob abzutransportieren. Reg. Baurat Dr. Jakob traf am 30.12. ein. Am 7.1. 1944 wurde mit der Verladung begonnen und bis 24.1. beendet. Zur Verladung kamen 1037 Faesser mit insgesamt 37180 kg. DCA. In der gleichen Zeit wurden 180 to. Tritol aus Tunnel 2 verladen. Verladung erfolgte auf Bahnhof Urbino.

Am 2.3.1944 kam der Befehl, die K-Munition (vordringlich 2 - , 4 - und 20 - kg. - Bomben) nach Norden zu verlagern (Koflug 2/VI, 499/44 g.Kdos.). Nach Erkundung des Lagers Negerina durch Hauptmann Maggialli brachte dieser am 9.3.44 vom FLCK XXVIII den Bescheid mit, dass eine Entscheidung noch nicht gefallen sei. (Sonderkommando, der Lw. 14/44 g.Kdos. vom 10.3.1944).

Am 13.3.1944 traf Hauptmann Tiply von der Lufthauptmunitionsanstalt K 4/XI zur Besichtigung ein. Der von ihm zugesagte sofortige Bescheid verzogerte sich bis 29.4.1944. Am diesem Tag erging Befehl der Umlagerung der K - Kleinmunition (Koflug 2/VI 2826/44 geh. vom 29.4.44) nach Negerina.

Im April/Mai wurden an verschiedene Flugplaetze Sprengbomben (100 und 250 Kg.) verausgabt, insgesamt 329 Tonnen.

Am 2.6. traf ein Entgiftungstrupp von Kurt - Mass - Cerrei, am 9.6. Oberstleutnant Spelten vom Feldzeuginspizient der Heeresgruppe C ein (Sonderkommando der Lw. 34/44 g.Kdos. vom 9.6.44). Am 21.6. war der Fuehrerbefehl ergangen, das Lager von K - Munition unbedingt zu raumen. Dazu kam am 6.7.44 Befehl vom OKW.- Wehrmachtsfuehrungsstab Br.B.Nr. 2274/44 g.Kdos., die Raeräumung des K - Lagers ohne Ruecksicht auf Verluste wegen der moeglichen Folgen durchzufuehren. Etwas gleichzeitig mit Feldzeugstab z.b.V. 45 (Leiter Hauptmann Klahn) traf am 23.6.1944 Oberstleutnant Lueders mit 200 Arbeits- und 64 Sicherungskraefte in Urbino ein. Dazu kamen von der Luftwaffe verschiedene Kolonnen mit insgesamt 210 Tonnen Laderaum an. Mit der Verladung wurde sofort begonnen. Laut Befehl der Heeresgruppe C wurde zunaechst K - Munition von Tunnel 2 nach Tunnel 1 verlagert. Inzwischen erging jedoch Befehl, alle K - Munition nach dem Reich zu schaffen, Gelbkreuz zu versenken. Weiss - und Blaukreuz wurde nach Savignano transportiert, infolge Feindeinwirkung musste nochmalige Umladung nach Cervia erfolgen. 3 Waggons Blaukreuz kamen spaeter zurueck und mussten noch versenkt werden. Die Versenkung des Gelbkreuzes (4300 Bomben zu 500 kg.) bereitete die gresste Schwierigkeit. Um die Verladung zu vereinfachen, wurde der Tunnel 1 so weit eingeebnet, dass ein Durchfahren der Wagen unter 2,20 Meter Ladebreite ermoeglicht wurde. Die Wagen wurden tagsueber im Tunnel beladen und fuhren nach Einbruch der Dunkelheit zunaechst nach Fano, spaeter nach Pesaro, wo Umladung auf einen Prahn erfolgte. Da der Schlepper unklar wurde, trat vom 6. bis 18.7. eine

eine

Zwangspause ein. Diese wurde mit Verladung von Sprengmunition ausgefüllt. Ab 17.7. war ein neues Fahrzeug von der Marine eingesetzt und in einmaligen, ab 19.7. zweimaligen Einsatz pro Nacht wurden sämtliche Gelbkreuzbomben versenkt. Diese letzten 10 Tage stellten an Menschen und Material höchste Anforderungen. Da nach Abzug der Einheit Luaders nur noch insgesamt 74 Arbeits- und Sicherungskräfte der Luftwaffe einsatzbereit waren (davon fielen infolge Kohlenoxydvergiftung 15 Mann noch zeitweilig aus), mussten diese Soldaten tagsüber zur Arbeit und nachts zum Transport und als Sicherungskräfte eingesetzt werden.

Insgesamt wurden transportiert :			
<u>An K - Munition:</u>	2 560	Tonnen	Abtransport
	600	Tonnen	Umtransport
<u>An Sprengbomben :</u>	5 770	Tonnen	
<u>zusammen :</u>	8 930	Tonnen	

In 60 Tagen wurden also durchschnittlich 150 Tonnen/Tag bewegt.

Versenkt wurden 1 316 Tonnen Gelbkreuz  
und 84 Tonnen Blaukreuz

Die Transportleistung wurde etwa zu 65 % von der Luftwaffe, zu 35 % vom Heer ausgeführt.

Am 23.7. kam der Befehl, das gesamte Zuendermaterial

(Messing) abzutransportieren. Dieser wurde von Sonderkommando selbst unter Zuhilfenahme von zivilen Arbeitskräften und kurzfristiger Unterstützung durch eine Pioniereinheit bis zum 28.7. durchgeführt. Es wurden 68 280 Stück im Gesamtgewicht von rund 89 Tonnen verladen. Verzögert wurde diese Arbeit, da 3500 verschraubte Kisten, in denen sich je 8 Zuender und 8 Leitwerke befanden, geöffnet werden mussten, und da der Abtransport z.T. durch fertig verlegte Minenfelder ueber grossere Strecken durch Menschenkraft erfolgen musste.

Am 7.8. war das gesamte Lager einschliesslich aller Tunnel vollkommen geräumt. Die Stazione und das Deposito waren durch Sprengung voellig eingeebnet, Tunnel 1 und 2 innerlich und an den beiden Ausgängen zerstört und geschlossen, Tunnel 3 (Casalina) und Tunnel 4 (Casanova) - im Vorfeld, bzw. unmittelbar hinter der neuen HKL. - an Geb. Pi. Batt. 95 bzw. Lehr - Pi. - Batt. 4, beide in zuendfertigen Zustand, Ordnungsgemäss uebergeben.

Das Sonderkommando verliess Urbino am 8.8.1944.

*Ommyer*  
Major und Kommandant