

Ministero dell' Ambiente  
Direzione Salvaguardia Ambientale del Ministero dell' Ambiente e della Tutela del Mare, Divisione IV  
Attenzione: Concessione d30 BCMD Ombrina Mare Medoilgas  
Via Cristoforo Colombo 44 - 00147 Roma

Rochester, July 21 2014

Dear representatives of the Italian government:

We are writing to recommend that authorization be denied to the drilling permit d30 BC MD off the coast of Abruzzo, as filed to your offices by London based Mediteranean Oil and Gas. The "Ombrina Mare" permit would allow a British company to drill 5 oil wells, install an FPSO desulfurizing unit and a series of pipelines roughly 5 miles from shore for the purpose of 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 Ombrina is particularly disturbing due to the presence of an FPSO, a Floating Production, Storage and Offloading unit, just a few miles from shore. FPSOs allow for storage of oil and loading of tankers at sea rather than from onshore terminal facilities. The storage and loading processes are subject to many hazards, such as potential collisions with tankers, pollution associated with the frequent transfer of oil to the tankers, continuous motions and stresses on a floating ship-structures. Several instances of structural failures, fires and explosions, collisions, breakdowns, uncontrolled emissions of oil to sea and shore, atmospheric pollution, have been reported in the literature. The average rate of accidents – that range from minor to more serious – is about 70 per year. Usually these structures are located tens or hundreds of miles from shore. Ombrina would be one of the rare cases where the FPSO is located in close proximity to shore, where several natural reserves are located. They are: Punta Aderci, Punta dell' Acquabella, Ripari di Giobbe, Grotta delle Farfalle, Lecceta di Torino di Sangro. The entire area, soon to become a National Park, is known for its rough beauty and pristine waters. Several beaches in the area employ many people in tourism and recreation activities. The lease also contains a fishing nursery financed by the E.U. How can an oil lease be compatible with these existing activities? The assets of Mediterranean Oil and Gas currently amount to only ten million British pounds, and it is unclear how and if they would be able to monitor and clean up in case of an accident.

Finally, our climate system is quickly changing in fast, unpredictable ways disrupting entire eco-systems. Humans are the cause of these changes, primarily through the use of fossil fuels: we cannot afford to keep the status quo. Instead of drilling Ombrina Mare, Italy should be one of the world's leaders in renewable energy due to its geographical position and its abundant solar and wind resources. In our opinion, such a beautiful area along the Adriatic coast should not be exposed to such risks. Abruzzo should stay green, fossil-fuel free and healthy for present and future generations.

Judy Braiman, President - Empire State Consumer Project, Inc. - Rochester, New York 14618 - USA