

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

Rochester, September 23 2014

Dear representatives of the Italian government:

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, we 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.

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