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Aughoose, Pullathomas, Ballina, Co. Mayo. 16th Feb. 2007.

EPA Headquarters, P.O Box 3000, Johnstown Castle Estate, Co. Wexford.

Dear Sirs.

Objection is made to the Proposed Determination of the Environmental Protection Agency to issue an Integrated Pollution Prevention and Control (IPPC) Licence to Shell E& P Ireland Ltd. Licence Register No PO738-01 to operate a gas refinery at Bellanaboy Bridge Gas Terminal Bellanaboy Bridge, Bellagelly South, Co. Mayo on the following grounds having regard to:

Council Directive 97/11/EC-EIA. Council Directive 96/61/EC-IPPC and EPA's Acts and Regulations.

The following observations are also submitted as part of our objections.

(1) The proposed Corrib Refinery will pump over 50,000 tonnes of emissions annually into the local Erris environment.

Emissions from two sale gas compressor tarbines (1 duty, 1 standby)

CO, CO, NO, SO, CH, VOC.

Emissions from three generators (2 duty, 1 standby)

CO, CO, NO, SO, CH, VOC.

Emissions from Flare or Pilot Gas use

CO, CO, NO, SO, CH, VOC

In its plan for sustainable development the Government aims to "Maintain local air quality and limit and reduce the Irish contribution to regional and global environmental problems".

This project in our opinion is not consistent with the government's plan " to maintain local air quality.

(2) As an introduction to our objection to cold venting, we would like to quote the UNECE Convention on Access to Information, Public Participation in decision - making and Access to Justice in Environmental Matters as adopted on the 25th June, 1998 in the Danish City of Aarhus at the Fourth Ministerial Conference in the 'Environment for Europe' process. This convention links environmental rights with human rights.

Kofi A Annin, Sec-Gen of the United Nations states: "Although regional in scope, the significance of the Aarhus Convention is global. It is by far the most impressive elaboration of principle 10 of the Rio declaration, which stresses the need for citizen's participation in environmental issues and for access to information on the environment held by public authorities. As such it is the most ambitious venture in

the area of environmental democracy so far undertaken under the auspices of the United Nations."

When Shell presented their original EIS no provision was made for cold venting. It showed gas flaring as their intention. Two years later the IPPC licence application included cold-venting gas as the purging method. This discrepancy was pointed out to the EPA. The EPA required Shell to clarify this cold venting matter vis-à-vis EIS. Shell supplied an addendum to the EIS in this regard which actually changed the EIS fundamentally on this issue.

IN the EPA's inspector report on a licence application 10/01/2007 we are given the statutory body's version of Shell's addendum re. cold venting. "The applicant stated that venting rather than flaring was selected arising from a commitment to the local community to minimise visual intrusion and disturbance and the requirement to provide an additional pilot gas to light the flare. What have any of these three reasons for granting cold venting got to do with the EPA issuing a licence? Shell's application for cold venting should have been included in the original EIS they presented to the Mayo County Council.

"It is estimated that 95 tonnes/year of natural gas will be lost by direct releases to air(cold venting)"

"As natural gas (methane) is lighter than air, it will continue to rise and will ground locally". These facts have been culled from the inspector's report for an IPPC licence from Shell E&P Ireland Ltd, 10/01/2007.

We are given the estimated tonnage of methans to be released annually as well as the guarantee that this gas "will rise and not ground locally".

How do these facts compare with Accuracts Inc. report on the Proposed Corrib Onshore System an Independent Analysis presented in Fiosru (CPI) publication Nov. 2005.

"Failure to properly restrict the option of cold venting should be regarded as a serious deficiency and prevented in any modern processing plant design and approval. Several responsible governments and world agencies have incorporated practices to discourage cold venting in their energy field development".

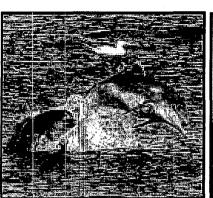
"Cold venting can be very dangerous not only for plant personnel but also the neighbouring population. Depending on the materials in the gas stream, especially if a plant is located on a site in proximity to people, dispersion can send heavier than air gas components to ground level with tragic results".

- "... given the capability of venting to generate heavier than air vapours that can produce catastrophic events in the area should the release get away from the operator". Richard B. Kuprewicz, Accufacts Ink. (page 34 The Proposed Corrib Onshore System, Fiosru).
- (3) The outfall pipe takes waste products not recoverable from the gas treatment process and transports them to the moutth of Broadhaven Bay, a Special Area of Conservation (SAC). A report by University College Cork (UCC) concluded "The waters of Broadhaven Bay represent an important area for a number of marine mammal species and for other marine life. In particular, in regard of it's relatively small size, there are very few, if any at all, examples of similar areas with all five Annex 2 (whale & dolphin) species regularly being present". The discharge will contain varying

Potassium, Calcium, Magnesium, Iron Hydroxide, Calcium Sulphate, Radon, Hydrocarbon Condensate. Methanol, Corrosion Inhibitor, Well Completion Muds, Scale inhibitor, Anti-foam, Heating Medium, Lube oils, Descaling Fluids and up to 3 tons of Lead, Nickel and Mercury every year. Other elements to be included are Barium, Boron, Phosphorous, Chromium, Manganese, Copper, Zinc, Arsenic, Selenium and Silver, this will not be "drinking water". These metals have the capability to bioaccumulate up through food chains and pose a threat to the presence of the aforementioned cetaceans, which are at the top of the food chain. Broadhaven Bay represents an internationally important area for Brent geese as well as other fish eating birds like the great white heron, the cormorant and the shag. The effects of bioaccumulation could also detrimentally affect these fish eating birds.

Signed,

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Carrowmore Lake, water supply for the entire region is at very serious risk of pollution. The issuing of this licence does not seek to protect the Irish environment but seeks to protect multi national oil companies at the expense of the pristine Irish environment.

By signing this petition I object to this licence being granted.

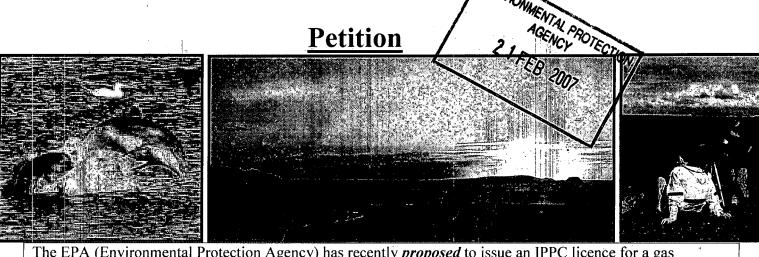
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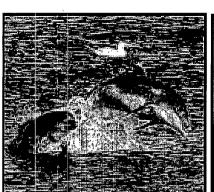
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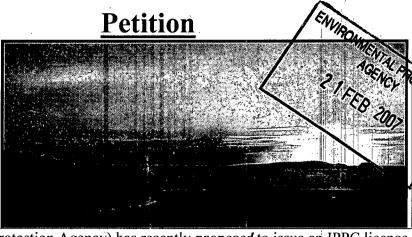
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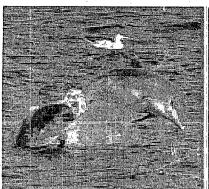


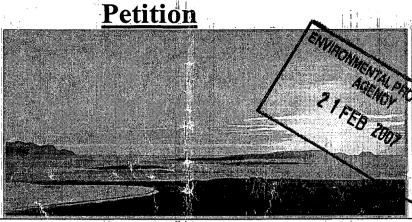




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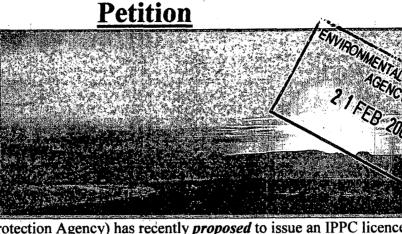




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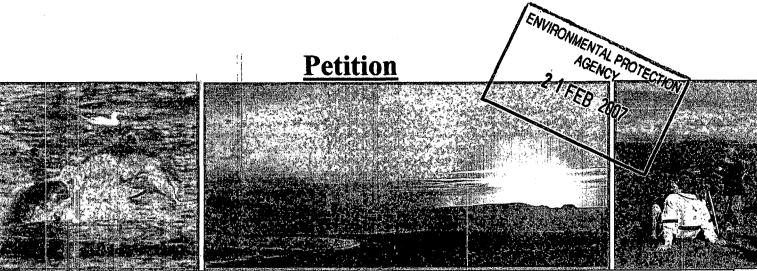
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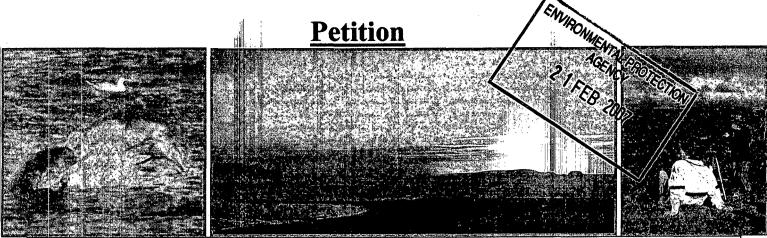
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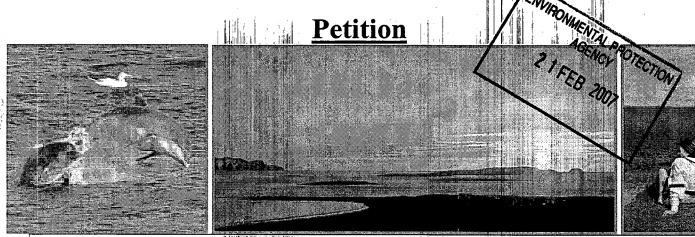
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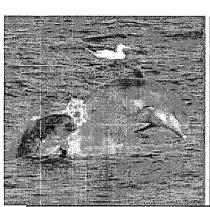
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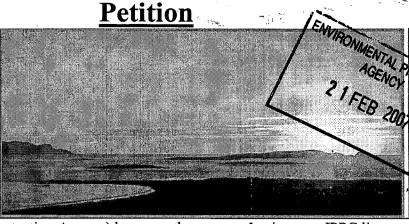


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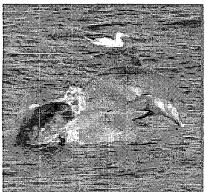


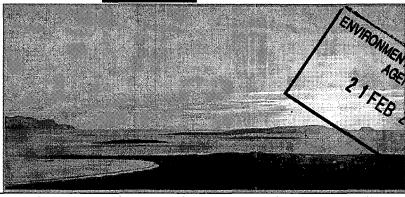


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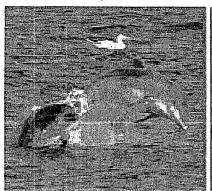


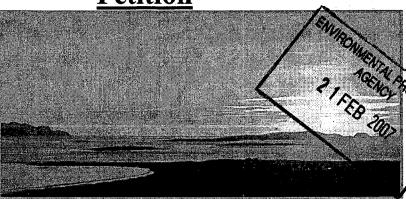
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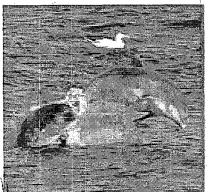


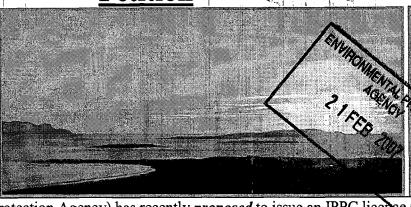
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