

**Noeleen Keavey**

---

**From:** Licensing Staff  
**Sent:** 22 June 2015 13:38  
**To:** Noeleen Keavey  
**Subject:** FW: PD P0738 03  
**Attachments:** MM Harrington to EPA June 2015 Comments.docx; EPA 22 June 2015 (1).odt

**From:** Monica Muller [<mailto:monicamuller9@gmail.com>]  
**Sent:** 22 June 2015 13:33  
**To:** Licensing Staff  
**Subject:** PD P0738 03

please find attached comments first and third parties PD P0738 03

--  
Monica Muller  
Rossport South  
Ballina  
County Mayo  
[monicamuller9@gmail.com](mailto:monicamuller9@gmail.com)

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

For inspection purposes only.  
Consent of copyright owner required for any other use.

For inspection purposes only.  
Consent of copyright owner required for any other use.

Monica Muller  
Rossport  
Ballina  
Co. Mayo  
Email: [monicamuller9@gmail.com](mailto:monicamuller9@gmail.com)

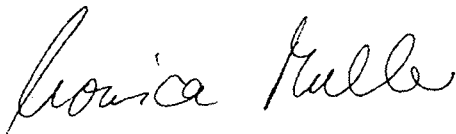
EPA  
Headquarters, PO Box 3000  
Johnstown Estate  
Co. Wexford

07/05/2015

Re: IE Licence Application Reg. NO. P0738-03, Comments on first and third parties  
objections by Monica Muller and on behalf of Maura Harrington :

Please find attached comments.

Yours sincerely,



Monica Muller  
Maura Harrington

For inspection purposes only.  
Consent of copyright owner required for any other use.

For inspection purposes only.  
Consent of copyright owner required for any other use.

I make the following submission in accordance with Regulation 26(1) of the EPA (Industrial Emissions) (Licensing) Regulations.

Objection No 1

I support the submission of Frances Micklem and others; but it's not just the likes of me anymore – no less a personage than Pope Francis 1, with the issuance of *Laudato Si*, has stated to the world his teaching on Climate Change. I downloaded the encyclical from the Vatican website, <https://laudatosi.com/download> which I attach as Appendix 1. I have read – and heeded – this document in its entirety and ask (with scant expectation it must be said) that the Board does likewise.

I draw the Board's attention to the Preamble to Bunreacht na h-Éireann which states:

In the Name of the Most Holy Trinity, from Whom is all authority and to Whom, as our final end, all actions both of men and States must be referred, We, the people of Éire, Humbly acknowledging all our obligations to our Divine Lord, Jesus Christ, Who sustained our fathers through centuries of trial...

[http://www.taoiseach.gov.ie/attached\\_files/Pdf%20files/Constitution%20of%20IrelandNov2004.pdf](http://www.taoiseach.gov.ie/attached_files/Pdf%20files/Constitution%20of%20IrelandNov2004.pdf)

and believe that *Laudato Si*, resting firmly within that Constitution, must be heeded by the Board.

Objection No 2

I support the submission of Ms Betty Schult and others.

Within the transcript of the 2002 ABP Oral Hearing (OH) into the proposed Shell/Corrib project (which the Board has in its possession and which it can I ask it to refer) there is a response by agents of the applicant in their testimony to the OH which time has proved to be a bare-faced lie. I raised the question of light pollution of the night sky in a hitherto unpolluted environment and will never forget the lying assurance of the applicant's agents – to wit, and I quote from memory, there would only be 'low level bollard lighting' at the refinery site which sought to create the impression that on-site workers would go about the site using old-fashioned flash-lamps.

On a map showing light pollution in Ireland, the Shell/Corrib Gas Refinery is the ONLY source of light pollution in the entire Barony of Erris. I request that the Board access and pay due consideration to the information available on <http://www.darksky.org/>

The Board may or may not be aware, – if not, it should be, and now is – that as a result of the fine work being done by Professor Brian Espey, TCD, and his team, it is now in train that conservation of the night sky is being undertaken by a Steering Committee for Ballycroy National Park; it is intended to extend this conservation to the Céide Fields area of north Mayo. In between lies the excrescence that is Shell/Corrib which is, I repeat, the ONLY source of light pollution in the entire area. In matters as important as the preservation of the *continuum* of integrity of Place it's not a matter of 'three strikes and you're out' – one proven

lie is quite enough.

### Objection No 3

I support the submission of An Taisce (fully accepting the *bona fides* of Mr Ian Lumley but retaining grave doubts regarding the steadfastness of officers of the Board of An Taisce).

In support of Point No 1 of this objection, I append a copy (Appendix 2) of the IMF Working Paper Fossil Fuels which, for the first time to my knowledge, is a comprehensive attempt to produce a true cost/benefit analysis – in the matter of fossil fuel exploration and production – on the cost to the earth for the benefit of the few. This paper, read in conjunction with Appendix 1 can, I believe, lead only to one inescapable conclusion – refusal for grant of Licence Review Application ref P0738-03.

In support of Point No 2 of this objection – 'Fit and Proper Person' – I submit the following:

Technical Ability: use of the term 'technical ability' in the context of the proposed Shell/Corrib project is an oxymoron – the proposed project is, quite simply, a dog's dinner of a project; it is irredeemably and irremediably flawed; if it were a much-loved pet, it would be brought to the vet and put down.

(i) I attach, once again, a copy of the Accufacts Report (2005) – may/may not be heeded this time... It is not good enough for either the Applicant or the Board to posit that, because this review application is different to the then proposal it's all 'new improved' and the report is redundant; rather the report is now strengthened in its findings.

Below two quotes as a sample:

Particular attention is paid to the issues of cold venting and excess flaring in gas processing plant design. More progressive governments have chosen to discourage cold venting and excess flaring practices for many prudent reasons and we would highly recommend avoiding either practice (Executive Summary).

In the design of pipeline safety systems, there can be a tendency to stay on one course based on an original "game plan" while attempting to correct serious deficiencies by incorporating additional changes to "fix" the original flawed design premise. The very nature of these "fixes" introduces complexity that can inadvertently drive the system to the very failure needing to be avoided. In complex energy system design such as high-pressure pipelines, we call this phenomenon of adding complexity to fix simple fundamental basic design premise errors, "Space Shuttle Syndrome." This label was coined after the NASA Challenger space shuttle loss and verified again after the second Columbia shuttle loss, and subsequently reaffirmed in the July, 2005 Discovery space shuttle launch. In Discovery's case, after approximately two billion dollars and a two year engineering effort, the foam hitting the shuttle on launch, the same problem that caused the Columbia's loss, had all too obviously not been fixed. Space Shuttle Syndrome has come to mean a complex organisation rushing to launch at all costs, failing to fix or address fundamentally flawed initial approaches, while utilising poor risk management to cloak their misguided confidence that everything will work (p14). <http://www.cym.ie/documents/Accufacts.pdf>

(ii) I do not believe that the current offshore work being done by the Applicant is simply to settle an errant Wavin surface-water removal pipe which was seen wandering on the surface

of Broadhaven Bay earlier this year. Placing what I believe are 8 tonne concrete mattresses over such a bit of pipe is overkill; it is – and will remain until verifiable proof to the contrary is forthcoming – my belief that the integrity of the production pipe, together with its umbilical, may well be compromised. The Applicant has not, to date, provided sufficient information to Environ Consultants upon which they may rely and, conveniently the next scheduled meeting of the Project Monitoring group is not until some time in August – by which time, it is my firm belief, the current 'temporary little arrangement' will have morphed into a permanent 'solution', all neatly packaged under the fig-leaf of 'best available' whatever. It is not possible for me as an individual to verify my belief for various reasons, principally accessibility and cost. The only way to satisfy such queries is for the Board to commission an ROV (Remote Operated Vehicle) survey of the production pipeline and umbilical. Will the Board do this... let's see...

Legal Standing: It would appear that the Applicant, not unusually, is once again being economical with the truth; it is convenient to state that there are no 'relevant convictions' under a series of Acts leading Mr Lumley to, in good faith, state therefore that no issues arise. While it may be correct that there are no convictions at present, the Applicant has not made full disclosure to the Board in the matter of one ongoing High Court case involving Health and Safety matters – ref 2011/10185P. There is yet to be an inquest held into the death of Lars Wagner RIP who died in an on-site accident in September 2013 during the construction of the tunnel for the onshore section of the production pipeline. I have contacted the HSA in relation to this – HSA ref ID 90714 – and have been told the following: 'The Health and Safety Authority (HSA) are liaising with the family on this investigation. This is a matter between the HSA & the deceased's family'.

There is also another inquest outstanding which is indirectly related to the proposed project; this relates to the accidental but nonetheless tragic death of a young mother who died following a road traffic accident while she was out walking – this death occurred in March 2013. On 05 June 2015 I spoke with the secretary to the Coroner for north Mayo who adopted a defensive tone when asked about the proposed scheduling of inquests outlined above – following some discussion she finally stated, and I quote from my note of the conversation, 'those two are waiting and will be; speak to the Garda Síochána behind in Belmullet – good afternoon now'.

Financial Standing: the financial standing of the Applicant is not what it used to be with the result that the status of RDS plc, of which Shell E&P Ireland Ltd is a wholly owned subsidiary, is much reduced; the result of the acquisition of BG by RDS is potentially problematic and has yet to be adjudicated upon by the markets; the RDS plc share price has dropped by 24-26% over the past year and is not expected to recover for some considerable time. Given the parent company's penchant for reliance on *force majeure* to avoid payment of costs in many instances, the Board cannot afford not to protect the integrity of this Place which remains under serious threat for as long as RDS is rampant.

#### Objection No 4

I support and rely upon the submission of Mr Sweetman

#### Objection No 5

I support the submission of Mr Harrington

Objection No 7

I vehemently do NOT support the submission of Shell E&P Ireland Ltd, a wholly owned subsidiary of Royal Dutch Shell plc.

Shell making a submission to the EPA in relation to the wording of 'conditions' attaching to grant of consent brings to mind nothing other than Oscar Wilde's description of fox hunting – 'the unspeakable in pursuit of the inedible'.

Objection No 8

I support the submission.

Maura Harrington

For inspection purposes only.  
Consent of copyright owner required for any other use.