

**Richton Salt Dome Issue**  
**April 10, 2008**

**Overview**

1. U.S. Dept. of Energy plans to core out the Richton, MS salt dome with 50,000,000 gallons of water per day from the Pascagoula River over a five year period.
2. The resulting Salt slurry will have a salt content 10 to 12 times higher than the salinity in the Mississippi Sound.
3. The Dept. of Energy is planning to pump the slurry by pipeline south of Horn Island, 12 miles off the Jackson County, MS coast line and dump the concentrated salt water into the Horn Island shipping channel over a five year period.

**Impact on the Pascagoula River Basin**

1. The removal of 50 million gallons of water per day has the potential to cause irreversible damage to the pristine Pascagoula River Basin. Today there are 23 endangered or rare species of fish, amphibians and birds that inhabit this 80+ mile stretch of un-inhabited river basin
2. Initiating the extraction of the water from the Pascagoula River may destroy these protected wildlife in direct violation of Federal Law
3. The wetlands, swamp and tidal lands may also be irreversibly harmed
4. The Pascagoula River Basin is the *ONLY* such river shed left in the United States. The Pascagoula River has no man-made dams, locks or channels and as a result is in pristine condition just as it was 10,000 years ago
5. Removal of this volume of water will result in the Gulf of Mexico being wicked up into the Pascagoula River, where the salt water will cause irreparable harm to the natural fresh water condition of the River Basin

**Impact on the Gulf of Mexico**

1. The Richton Salt Dome slurry is estimated to total 94,000,000,000,000 (94 Billion Gallons) of highly concentrated saline solution. Salt content will run 8-12 times higher than the natural saline content of the Mississippi Sound.
2. The saline slurry will kill all marine life that it envelopes: Shrimp, fish, oysters, crabs, larvae, eggs, etc. The potential harm is beyond calculation

3. The saline slurry will create a dead zone that could grow to well over 200 miles X 10 miles by 20 feet deep
4. The lowered water levels of the Pascagoula River will provide a natural wicking effect as more of the saltier Gulf Water is drawn further up river endangering over 300 indigenous species of plants plus fresh water wild life
5. The tidal Estuarine (sub-tidal), Riverine Estuary, (sand), Rivreine Estuary (muddy sand), Tape Grass Beds, Large Tidal Creek; Estuariene Intertidal Meshhaline Marsh, Oligohaline Marsh, Tidal Freshwater Marsh, Tidal Fresh Water Marsh and other indigenous areas such as the native Cyprus Swamp, Black Gum Swamp and Riverine Sand Bars will all be placed into what could become an irreversible jeopardy by the concentrated salt water invasion and cause permanent harm if not totally destroyed.
6. To date, the Federal Government has spent hundreds of millions of dollars trying to protect the barrier islands such as Horn, Petit Boise, Round, Ship, Chandeleur, Cat, Deer and other island along the MS and LA coasts. Further, hundreds of millions of dollars have been spend in South Louisiana trying to re-generate the tidal marsh lands that make up the South Louisiana and N. East Texas Coasts. These areas are crucial in mainland protection against Hurricane Flooding by acting as a Natural Break Water against storm surges. The resulting destruction of the plant life in these areas will further endanger the coastal communities to future hurricane-damages due to the loss of the marsh-lands due to the heavy saline content of the slurry that is dumped into the Mississippi Sound. The prevailing currents are from East to West and the concentrated saline solution will be carried across the upper Mississippi Sound into the tide lands of Mississippi & Louisiana
7. The breeding grounds for a great percentage of the nation's salt water sea-foods including: Fish, Shrimp, Crab and Oysters can be destroyed or irreversibly damaged due to the impact of 94+ Billion Gallons of concentrated saline slurry being pumped into the Gulf of Mexico for over 1,825 days during the five year life of the Richton Salt Dome project.
8. The potential harm from this debacle is incalculable with the loss or destruction of *the nation's only remaining , untouched natural watershed*: The Pascagoula River Basin. The loss of endangered species, wild life, flora, fauna, aquatic-life; the loss of fresh, tidal and salt water grass lands and marshes, the loss of fresh water plant grass beds, is assured. The resulting destruction of breeding grounds for salt and fresh water marine species from the poisoning of concentrated saline water could well cause irreversible damage to the marine life, as well as the economy provided by the sea food industry, sport fishermen, and tourists.
9. One noted PhD Marine Biologist with over 40 years experience whose entire career has included hands on research and management of Marine Research activities along eh MS Gulf Coast stated to the Petitioner that the impact studies

upon which the decision was made to proceed with the Richton Salt Dome saline project were invalid as they were based upon 20+ year old data that was not credible.

He further stated that the project could well be a potential disaster and that no aquatic sea life Salt or Fresh Water could survive exposure to the concentrated saline solution.

#### SUMMARY

Previous Hearings held by the Dept. of Energy for the Richton Salt Dome project were a farce. Proposed follow on hearing are also a sham attempt to placate the out rage being expressed by the citizens of the MS Gulf Coast over the potential harm that the Richton Salt Dome Project will cause the Pascagoula River Basin, the Barrier Islands, the Tidal Marsh and Grass lands, the breeding grounds of the fresh water and salt water sea life, and the destruction of all sea life that come into contact with the concentrated salt water, and the possible eradication of endangered species in the Pascagoula River Basis already protected by Federal Law.

It is the position of this petitioner that the United States Government cease and desist all further work on the Richton Salt Dome Project including design, funding, engineering, pipeline construction, and any & all other activities associated with this project.

Cessation of these activities should begin immediately by all parties associated with this project including but not limited to: The United States Dept. of Energy, The MS Dept. of Environmental Quality, The MS Board of Marine Resources, The United States Federal Park Service, the State of Mississippi and the United States Federal *Government until such time as these government agencies can prove beyond a reasonable doubt* that dumping the described concentrated salt water slurry into the Mississippi Sound and/or the Gulf of Mexico *will not* kill or harm the natural sea life of the gulf waters, the Mississippi Sound, the Pascagoula River and its estuaries, bayous, grasses, marsh lands (salt and fresh water) and the Flora, Fauna, Marine Life of the Pascagoula River Basin including the endangered species listed herein.

#### PETITIONER:

Robert M. Hardy- President  
Protect Our Coast, Inc.

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Protect Our Coast, Inc. is a Non Profit 501 (3) C Corporation  
Fed Tax ID

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The Richton Salt Dome debacle is a train wreck headed straight at Pascagoula, Gautier, & Ocean Springs, MS. If our government is hell bent on changing our Gulf Coast into the equivalent of Israel's Dead Sea or the Great Salt Lake in Utah then God help us for we will reap what we sow. The Pascagoula River might be able to heal itself over time, but we just may be creating a dead zone in the Gulf that might last for hundreds of years. And at our present rate of crude oil consumption, how many weeks or months of petroleum products will the increase in our strategic reserves provide? A couple of months at best.

When asked about this issue, the official response was a copy of the press release that said (1) President Bush wants it, (2) its good for national defense, and (3) it will provide a few jobs in Richton. But at what Cost? Folks, we are getting hosed and if this program continues we will have no one to blame but ourselves when the damage is done.

Obviously, the threat to the MS Gulf Coast is of no concern in Washington DC . This debacle high lights the U.S. Government and the Dept. of Energy's gross incompetence and it is obvious that the entire project is fueled by special person's and companies' own self interest. Crude Oil is worthless unless it is converted into Gasoline, Kerosene, lubricant oil, etc. So who is really behind this pending disaster? It has to be the Oil Companies. Why do you think that Congress has an approval rating of about 14%? Its because of the elitist mentality that has infected our officials and the professional bureaucrats in Washington. The Bureaucrats' primary focus is to CYA and stay at the trough, while the politicians focus is to get re-elected.

In addition there is a conflict of interest on the part of at least one elected official that borders on criminal malfeasance. See Exhibit 1 to this document. This is compounded by the fact that the Oil Monopoly in the United States own a substantial amount of the known oil reserves and stand to benefit by selling the crude oil to the U.S. Government under the guise of the Richton Dome Project. Then, by having access to the crude oil, they stand to gain on the manufacturing end of the program by reaping record high prices as they sell the finished product at to the end user.

In addition, if the Petroeum Reserve is because of a potential Hurricane, as one of the arguments for this project suggests, when (not if) the next hurricane hits Pascagoula, The Dept. of Energy shouldn't be planning on using Chevron to process the Crude for about 6 months or so.

#### **GROSS INCOMPETENCE**

The Dept. of Energy has had almost 25 years and has spent \$800 Billion dollars since its inception following the Oil Embargo of the Jimmy Carter era. And what do we have to show for it? *Nothing*. A zero policy, with no viable alternative energy program, a frozen nuclear power program that is 20 years behind the curve, and no firm policies on Detroit and the Automobile Industry.

In other words, NOTHING.; "But we are going to start working on it now because....well our failure over the past 25 years is really no one's fault; and besides its all history, isn't it?"

By potentially killing a huge area of the MS Sound, the idiots who have come up with this plan show that they could care less about Pascagoula, Jackson County and the wider Gulf Coast.

#### **DOES THE GOVERNMENT PROCESS REALLY CARE?**

The Richton Salt Dome project parallels the same caliber of "compassionate, forward thinking" government professionals that have allowed our local industries to discharge 1,560,000,000 pounds of Carcinogens and Toxicants into our air, water, land fills, deep wells in Jackson County or hauled out of state over the past 12 years. In 2006 we had reported over 2.4 million pounds of of carcinogens that were released for every man, woman and child in Jackson County. That's 34.7 pounds; compared with Hinds County at 1.4 pounds per person. And interestingly enough, Jackson County now is in the *top 10% of Cancer Incident and Cancer Death rates, per capita*, out of 3,171 counties in the United States. The top10%. Mississippi is in the top 5 states in the U.S. with its per capita Cancer Rates, and Jackson County is 147% higher than Mississippi. As an example in Colmer Middle School, with about 28 faculty, 6 teachers have cancer as of today. So the bottom line is that our government is responsible for allowing the permits that authorize the release of these carcinogens and as a result every 1.5 days a person dies of cancer in Jackson County seven days per week.

It's not enough that we are killing off our citizens. Let's endanger the marine life and aquatic flora and fauna in the MS Sound and the Pascagoula River well. The potential impact won't be like an oil spill that you can clean up. The potential disaster from this debacle might be forever.

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Mississippi's governor, Haley Barbour, has shut down all discussion on the Richton Salt Dome and has stated that he does not believe that taking 50 million gallons of water each day out of the Pascagoula River for five years will endanger the pristine river's watershed with its Cypress and Black Gum swamps, river grass beds, or the 33 endangered species that live there. Nor will the discharge of 94 Billion gallons of concentrated saline slurry dumped into the Mississippi Sound harm the Shrimp, Fish, Crabs, Oysters, sea beds, breeding grounds, estuaries or the Pascagoula River. When local residents called the governor's staff to express their outrage, they were told that the governor fully endorses the project and that if they had a problem, they needed to call Washington, D.C. His position is under the guise of "Economic Development".

#### **POLITICAL NEPOTISM AT ITS WORSE**

Governor Barbour is a principle and owner of the Washington DC lobbying firm, Barbour, Rogers & Griffin. A Vice President in this lobbying group is the *former Chief of Staff of the Dept. of Energy*, Eric Burgeron. Remember, the Dept. of Energy has the grand idea of buying 1 billion barrels of crude oil that has been taken from the ground, hauled half way around the world and then put back into under ground reservoirs. Hence, the "need" for the Richton Salt Dome debacle. Many of these reservoirs already exist, but rest assured we are looking at a multi-billion project and there is a ton of money to be spent. To start the project, the government already has spent \$25 million of tax payers' money to buy the land under which the salt dome lies.

#### ***FOLLOW THE MONEY:***

In 2007, Barbour, Rogers & Griffin received \$17.4 million from their Clients. That's \$68,125/day or \$9,083/hour. And although Gov. Barbour's interests are supposedly in a blind trust; that trust paid him over \$300,000 in 2006. Could we have a conflict of interest?

The public record from Barbour's lobbying firm's web site shows that they were paid \$3.25 million by companies that have a vested interest in Oil Refineries, Pipelines, Oil-Tankers and companies that broker (buy and sell) crude oil along with petro-chemical manufactures.

#### **But Wait!!! The plot thickens.**

While we are waiting for a "new round of public meetings" so that the Dept. of Energy can listen to our concerns and outrage, ostensibly to give serious consideration to our local input, On March 7, 2008 the DOE announced their intention to release a Bid Request for five year \$25 million dollar project. This project is entitled "Technical and Analytical Support services to Strategic Petroleum Reserves." For anyone interested, the reference is SOL DE-RP01-08FE70069 POC Benjamin Lardizabal, Contracting Officer, 202-287-1479, [benjamin.lardizabal@hq.doe.gov](mailto:benjamin.lardizabal@hq.doe.gov); Linda & Linda Sapp, Contract Specialist. 202-287-1518, [linda.sapp@hq.doe.gov](mailto:linda.sapp@hq.doe.gov).

It would appear that the Dept. of Energy in Washington D.C. is not waiting for a final judgment from DOE based upon the input of the good folks from Jackson County over the next few weeks. Rather it looks like a done deal from this end, and our Governor has a vested interest in this project.

Again, follow the money, folks. The trail stinks. Don't be fooled into thinking that another round of "hearings" by the Dept. of Energy will have any impact on the Richton Salt Dome debacle. This is a back-office done deal and the citizens of Jackson County are going to pay the price if we don't unite and demand that our elected representative intercede in Washington to pull the plug on this farce. Our only recourse may be through the courts. A non profit corporation, Protect Our Coast, Inc. has been formed for this very purpose.

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## **THREAT TO ENDANGERED SPECIES**

### **Overview**

#### **Impact on the Pascagoula River Basin**

1. The removal of 50 million gallons of water per day has the potential to cause irreversible damage to the pristine Pascagoula River Basin. Today there are 31 endangered or rare species of fish, amphibians and birds that inhabit this 80+ mile stretch of pristine undeveloped river basin. Initiating the extraction of the water from the Pascagoula River may destroy these protected wildlife in direct violation of Federal Law. The wetlands, swamp and tidal lands may also be irreversibly harmed

The following endangered species are listed in the Pascagoula River Basin habitat as published by the MS Museum of Natural History:

Gulf Sturgeon	Red Cockaded Woodpecker
One Toed Amphiuma	Florida Panther
Logger Head Turtle	Dark Gopher Frog
Green Turtle	Bewick's Wren
Gopher tortoise	Louisiana Black Bear
Yellow Blotched Map Turtle	Southern Hog Nose Snake
MS Red Belly Turtle	Black Pine Snake
Ringed Map Turtle	Piping Plover
Peregrine Falcom	Eastern Indigo Snake
Rain Bow Snake	Iron Color Gopher
Kemp's or Atlantic Ridley	Manatee
Brown Pelican	Pyramid Pigtoe
Inflated Heelsplitter	Rabbits Foot
Delicate Spike	

#### **Endangered Fresh & Saltwater Flora**

The lowered water levels of the Pascagoula River will provide a natural wicking effect as more of the saltier Gulf Water is drawn further up river endangering over 300 indigenous species of plants plus fresh water wild life. Among this plant life which plays a critical role in the aquatic habitat and spawning beds for fresh water and salt water wild life include

- The tidal Estuarine (sub-tidal)
- Riverine Estuary, (sand)
- Rivrine Estuary (muddy sand)
- Tape Grass Beds
- Large Tidal Creek

Estuariene Intertidal Mesohaline Marsh  
Oligohaline Marsh  
Tidal Fresh Water Marsh

and other indigenous areas such as the native Cyprus Swamp, Black Gum Swamp and Riverine Sand Bars will all be placed into what could become an irreversible jeopardy by the concentrated salt water invasion and cause permanent harm if not totally destroyed.

#### **THE BARRIER ISLANDS AND SALT MARSHES OF MS & LA .**

To date, the Federal Government has spent hundreds of millions of dollars trying to protect the barrier islands such as Horn, Petit Bois, Round, Ship, Chandeleur, Cat, Deer and other island along the MS and LA coasts. Further, hundreds of millions of dollars have been spend in South Louisiana trying to re-generate the tidal marsh lands that make up the South Louisiana and N. East Texas Coasts. These areas are crucial in mainland protection against Hurricane Flooding by acting as a Natural Break Water against storm surges. The resulting destruction of the plant life in these areas will further endanger the coastal communities to future hurricane damages due to the loss of the marsh lands due to the heavy saline content of the slurry that is dumped into the Mississippi Sound. The prevailing currents are from East to West and the concentrated saline solution will be carried across the upper Mississippi Sound into the tide lands of Mississippi & Louisiana

#### **SUMMARY**

Previous Hearings held by the Dept. of Energy for the Richton Salt Dome project are highly suspect due to the timing and location immediately following Hurricane Katrina. . Is the proposed follow on hearing also a sham attempt to placate the out rage being expressed by the citizens of the MS Gulf Coast? Is the threat for potential harm that the Richton Salt Dome Project will cause the Pascagoula River Basin, the Barrier Islands, the Tidal Marsh and Grass lands, the breeding grounds of the fresh water and salt water sea life, and the destruction of all sea life that come into contact with the concentrated salt water real? If so how can the possible eradication of endangered species in the Pascagoula River Basis already protected by Federal Law be allowed to happen?.

The Mississippi Sound, the Pascagoula River and its estuaries, bayous, grasses, marsh lands (salt and fresh water) and the Flora, Fauna, & Marine Life of the Pascagoula River Basin including the endangered species listed herein are sufficient reason to halt this criminal activity that has been endorsed by elected officials and individuals who have gained, financially and who have expressed their utter contempt to the well being of our local habitat and the expressed wishes of the citizens of Jackson & George County, MS .

#### **Threat to the Gulf of Mexico & the Mississippi Sound**

It is generally agreed that the once pristine waters of the Gulf of Mexico are gradually changing. A few years back, the waters were clear to a depth of about 4 to 5 meters. Today, those same waters are pasty and the Gulf of Mexico is gradually becoming a polluted coastal waterway. The current situation is a combination of natural and human induced processes. The Gulf of Mexico's diverse and productive ecosystem provides a variety of valuable resources and services to the region including transportation,

recreation, fish and shellfish, and petroleum and minerals, and as such the effects of pollution on the shoreline communities, marine mammals, birds, and other aquatic life within the region cannot be over-emphasized. Spills and dumping from oil tankers that navigate the Gulf of Mexico waters are among the chief causes of both marine and beach debris. Nonpoint-source pollution such as debris from inland municipal sewage, waste disposal facilities and urban and agricultural runoff add to the problem. These materials often entangle, maim, or kill aquatic creatures. When fish and marine mammals feed on these synthetic materials, they subsequently enter the food chain. Because circulation within the Gulf is limited, solid waste and other pollutants float along with the currents until, eventually, they wash up on shore. This debris thus accumulates along the Gulf coast, affecting both tourism and coastal habitats.

**Examples of annual pollutant and nutrient loading in the region are:**

- \* 891,974 tons of nitrogen
- \* 221,526 tons of phosphorus
- \* 100 million tons of dredged sediments
- \* 2,720 tons of toxic substances from coastal industrial and municipal sites (four of the top five states in the U.S. in total surface discharge of toxic chemicals are Gulf States - Alabama, Mississippi, Louisiana and Texas)
- \* 1,040 tons of pesticides from coastal agriculture
- \* 6,170 tons of produced waters from near-shore oil and gas platforms

**Just a few of the listed endangered species by the U.S. Dept. of Wild Life & Fisheries include:**

Green Sea Turtle	Hawks Bill Turtle
Kemp's Ridley Sea Turtle	Logger Head Turtle
Leatherback Turtle	Gulf, Pallid and Alabama Sturgeon Species
Small Tooth Sawfish	Dolphins
Humpback & Finback Whales	

In addition the Barrier Islands including Horn Island, Round Island, Petit Boise, Cat Island, Ship Island and others have endangered species listed among them include the American Alligator, Night Flowering Ruellia, Osprey, and Oyster Reefs. Other lists of endangered species from the U.S. Government are reflected below

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Other Endangered Species for the Pascagoula River Basin  
Published by the United States Government  
Dept. of Interior, Marine Fisheries & Wild Life  
U.S. Park Service

- E Clubshell, black (*Pleurobema curtum*)
- E Clubshell, ovate (*Pleurobema perovatum*)
- E Clubshell, southern (*Pleurobema decisum*)
- E Combshell, southern (*Epioblasma penita*)
- E Crane, Mississippi sandhill (*Grus canadensis pulla*)
- T Darter, bayou (*Etheostoma rubrum*)
- T Moccasinshell, Alabama (*Medionidus acutissimus*)
- T Mucket, orangenacre (*Lampsilis perovalis*)
- E Pigtoe, flat (*Pleurobema marshalli*)
- T Plover, piping except Great Lakes watershed (*Charadrius melodus*)
- E Pocketbook, fat (*Potamilus capax*)
- E Stirrupshell (*Quadrula stapes*)
- E Sturgeon, Alabama (*Scaphirhynchus suttkusi*)
- T Sturgeon, gulf (*Acipenser oxyrinchus desotoi*)
- E Sturgeon, pallid (*Scaphirhynchus albus*)
- E Tern, least interior pop. (*Sterna antillarum*)