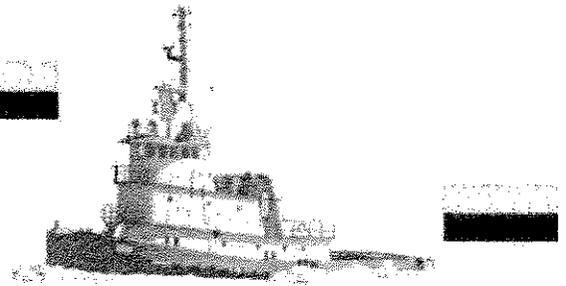


# Dann Marine Towing, LC

CANAL PLACE

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(410) 885-5055 / (800) 770-TUGS / FAX (410) 885-5570



Minerals Management Service  
Office of Offshore Alternative Energy Programs  
381 Elden Street, Mail Stop 4090  
Herndon, VA 20170-4817

RECEIVED  
6/24/10  
at OAEF

June 23, 2010

**Subj: MMS-2010-OMM-017: Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) offshore Delaware – Request for Interest**

Ref: (a) MMS-2010-OMM-017

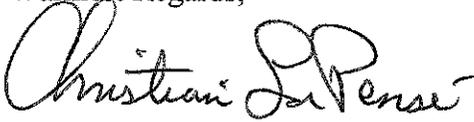
Dann Marine Towing appreciates the time and effort invested into the proposed off shore leases for alternative energy, namely off the coast of Delaware Bay as outlined in Reference (a). We agree with the need for clean renewable energy resources, however fear there are safety oversights that would no doubt interfere and could conceivably harm the Tugboat and Barge Industry operating in the Mid-Atlantic Region. Below is an outline of our concerns.

1. The shear size, scope and magnitude of this project is enormous and centered on one of the busiest shipping channels of the United States. These approach channels that border the north and south boundaries of the proposed wind farm funnel international and coastal shipping into the Delaware Bay. Coastal traffic currently make use of this area between the shipping channels regularly in order to avoid the larger vessels transiting the Delaware Bay Region. Restricting this area from commercial passage will have a two pronged effect. First, it will require Coastal-shipping traffic to divert east or west from the proposed restricted zone. This diversion will add at least five to twelve nautical miles to the routes depending on the sea state and weather conditions. Secondly, higher sea states would likely divert most vessel traffic west of the proposed wind farm field. This subsequent increase of vessel traffic in the entrance to Delaware Bay would likely place these vessels at greater risk for a marine incident.
2. The economical impact of this proposed zone is also of concern. This zone will increase the voyage time by at least an hour, possibly four, again depending on the sea state and weather conditions. This will add to the cost of goods as well as the amount of fuel consumed. Also worth mentioning is the escalation of the amounts of emissions and other incidental discharges.

We know that there are many forces molding these new off shore lease policies and we appreciate your time and attention to our concerns. Dann Marine Towing extends an invitation to our facility or any of our tugboats to validate our concerns to any member of the MMS, USCG or congressional advocates that are involved with drafting these new procedures. We feel that those members fine tuning these new regulations may better understand our challenges as business model.

Once again we thank you for our time. Please feel free to contact us with any questions. Or concerns.

Warmest Regards,

A handwritten signature in cursive script that reads "Christian LaPense". The signature is written in black ink and is positioned above the printed name and title.

Christian LaPense  
Compliance Director  
Dann Marine Towing