



U.S. Department of Justice

Environment and Natural Resources Division

Environmental Crimes Section  
P.O. Box 23985  
L'Enfant Plaza Station  
Washington, DC 20026-3985

Telephone (202) 305-0321  
Facsimile (202) 305-0397

October 7, 2010

Robert C. Bundy  
Dorsey & Whitney LLP  
1031 West Fourth Avenue, Suite 600  
Anchorage, AK 99501  
By Email: Bundy.Robert@dorsey.com

Re: United States v. Ionia Management, S.A.

Dear Mr. Bundy:

Pursuant to your letter of October 1, 2010, the government submits this response to Ionia Management's request that you recommend to the Court that the M/T Ploutos be added to the Special Master Scope of Work and permitted to enter U.S. ports. Based on Ionia's representations that they have corrected the issues identified in the audit report, we have no objection to a recommendation that the vessel be permitted to call on a U.S. port. We suggest that the photographs confirming the painting of the piping and floor plates identified by the auditor and named in the Scope of Work be shared with the Special Master and parties prior to the ship's entry into Port.

Additionally, although likely obvious and not specifically within the purview of the Scope of Work and audit, we note for the benefit of all parties, that the ship will need to be in compliance with all U.S. laws, regulations, and requirements for entry into port, including the Vessel General Permit and Oil Transfer Procedure requirements.

Sincerely,

Lana N. Pettus  
Trial Attorney  
Environmental Crimes Section  
United States Department of Justice

Cc: Michael Chalos, Esq.  
AUSA William M. Brown  
LCDR Channing Burgess  
CDR Mooradian  
James Sanborn  
Capt. Richard Wigger  
Patrick Norton

EXHIBIT 2  
1 of 1