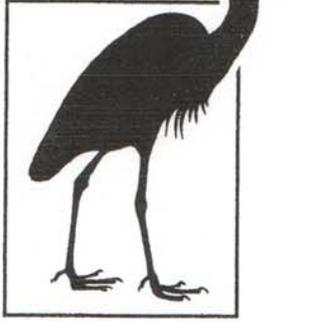


GREAT
BAY



STEWARDS

*Supporting
education,
research &
conservation
on Great Bay.*

Great Bay
Stewards
89 Depot Rd.
Greenland, NH
03840

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NEW HAMPSHIRE SITE EVALUATION COMMITTEE
OF THE NEW HAMPSHIRE PUBLIC UTILITIES
COMMISSION

IN THE MATTER OF THE APPLICATION OF SEA 3, INC.

SEC Docket No. 2015-01

MOTION TO INTERVENE

NOW COME the Great Bay Stewards of 89 Depot Road, Greenland, New Hampshire 03840 ("Proposed Intervenors"), and respectfully submit this Motion to Intervene in the above-captioned proceeding.

Background

1. This is an application by the Applicant Sea 3, Inc. ("Sea 3") for a waiver from the approval and certification provisions of RSA Chapter 162-H, relating to energy facility evaluation, siting, construction and operation.
2. The undersigned Intervenors are a non-profit membership organization whose mission is to preserve and protect the Great Bay for future generations. The organization is located at 89 Depot Road, Greenland, New Hampshire, 03840. The Intervenors are directly affected, including affects to safety, welfare, health and property value, by the dramatic expansion of operations contemplated by the Applicant Sea 3's projected "improvements," described at pages 7 through 9 of the Sea 3 application for waiver.

Interests of the Proposed Intervenors

3. The Intervenors strongly oppose the waiver and exemption request made by the Applicant for the reasons set forth in the letter dated March 13, 2015 to the SEC from the Great Bay Stewards, which is respectfully annexed hereto and incorporated by reference in this Motion to Intervene, as if fully set forth herein. The project has already been declared to be of sufficient size and importance as to be a project of regional impact under New Hampshire law. The proposed Intervenors' headquarters is located in a neighboring community and is directly along the rail tracks which are intended to service the expansion, with substantial intensification of the use of those tracks and the carrying of materials to the Sea 3 facility.

4. The undersigned Intervenors respectfully state that this project, as described by SEA-3, being dependent on the delivery of propane by the Pan Am rail line, poses an environmental threat to the health of the Great Bay and thereby the public's economic interests, property values, health, safety and welfare are directly implicated by the Sea 3 expansion, and by the current application before the Site Evaluation Committee of the New Hampshire Public Utilities Commission, warranting status as intervenors and parties before the SEC and in this proceeding. Additionally, the Great Bay Stewards note the large number of

children who attend outdoor educational events at the Great Bay Discovery Center immediately adjacent to the rail tracks which adds another public safety concern. The Intervenor respectfully request an Order by the SEC allowing them to proceed as Intervenor and parties, and to receive copies of the all of the relevant filings by the Applicant, and other parties and interested persons.

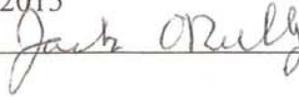
Respectfully

submitted,

**THE GREAT BAY
STEWARDS**

Date: April 30, 2015

By: _____



Jack O'Reilly,

President

CERTIFICATION

I hereby certify that on this 2nd day of May 2015, I served a copy of the foregoing via U.S. First Class Mail on:

Hon. Martin P. Honigberg, Chairman,
Site Evaluation Committee
c/o NH Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429