## NH DEPT OF ENVIRONMENTAL SERVICES

MAY 01 2012

April [#], 2012

Amy L. Ignatius, Vice Chairman New Hampshire Site Evaluation Committee c/o New Hampshire Department of Environmental Services 29 Hazen Drive, PO Box 95 Concord, New Hampshire 03302-0095

RE: Docket No. 2012-01 Application of Antrim Wind, LLC for a Certificate of Site and Facility for a Renewable Energy Facility to be Located in Antrim, Hillsborough County, New Hampshire

Dear Chairman Ignatius,

Attached please find for filing in this matter the Motion to Intervene of Samuel E. & Michele D. Apkarian.

Sincerely,

Samuel E. & Michele D. Apkarian

54 Liberty Farm Road

Antrim, New Hampshire 03440

## STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

RE: Application of Antrim Wind Energy, LLC	)
for a Certificate of Site and Facility for a	)
Renewable Energy Facility to be Located	)
In Antrim, Hillsborough County, New Hampshire	)
SEC Docket Number 2012-01	)

## MOTION TO INTERVENE PRO SE OF [name]

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11, Samuel & Michele Apkarian hereby moves for permission to intervene *pro se* in the above-referenced proceeding. In support of their Motion to Intervene, Samuel & Michele Apkarian offer the following arguments:

(1.) Samuel & Michele Apkarian can demonstrate a substantial interest which may be affected by the outcome of the proceeding.

As appellant in previous cases, we are concern over our property value, the viewshed, the noise, health issues, and the adverse effects on domestic and wild life etc. due to proximity, about 1 mile. The preconstruction activity will potentially cause disruption in traffic, noise and dust pollution.

(2.) The interest of Samuel & Michele Apkarian will not be adequately protected by other parties.

In exercising its discretion, we respectfully ask that the Committee consider whether the party's interest will be adequately protected by other parties. Since we, as residents of the North Branch region of Antrim where the proposed wind facility would be constructed, do not feel that our interests and concerns have been addressed thus far in proceedings by the Town Boards of Antrim, we do not believe that any other party to this proceeding can adequately represent our interests in proceedings before the Committee.

(3.) The intervention of Samuel & Michele Apkarian will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

Pursuant to the SEC Order of March 20, 2012, Samuel & Michele Apkarian files this Motion to Intervene by the deadline set forth by the Committee for Docket 2012-01 and requests that we be permitted to intervene with full standing to participate in all phases and activities of the proceeding. We respect the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee or the parties in reaching an outcome. We are prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offer that our participation, if permitted, would be in the interest of justice.

Dated this 30 day of April, 2012. Respectfully submitted,

Michele N. Upyare Samuel E. & Michele D. Apkarian

54 Liberty Farm Road

Antrim, NH 03440

603 588-4859