



April 16, 2015

Matt and Erica Nania  
18 Dunlin Way  
Portsmouth, NH 03801  
603-501-0757

Martin P. Honigberg, Chairman  
Site Evaluation Committee  
c/o NH Public Utilities commission  
21 South Fruit Street, Suite 10  
Concord, NH 033 01-2429

Re: Docket 2015-01 Sea-3 Request for exemption from a full Site Evaluation Committee project review.

Dear Mr. Honigberg,

I am writing in regards to the request by Sea-3 to receive an exemption from the full Site Evaluation Committee project review.

My wife Erica and I live in Portsmouth on Dunlin Way, in the neighborhood of Osprey's Landing. We have never spoken out about local business or projects, but we are very concerned about the proposal by Sea-3.

The requested expansion by Sea-3 will result in an exponential increase in shipments of propane by rail on tracks that run through Stratham, Greenland, Portsmouth, and Newington. We and our fellow neighbors have strong concerns about this.

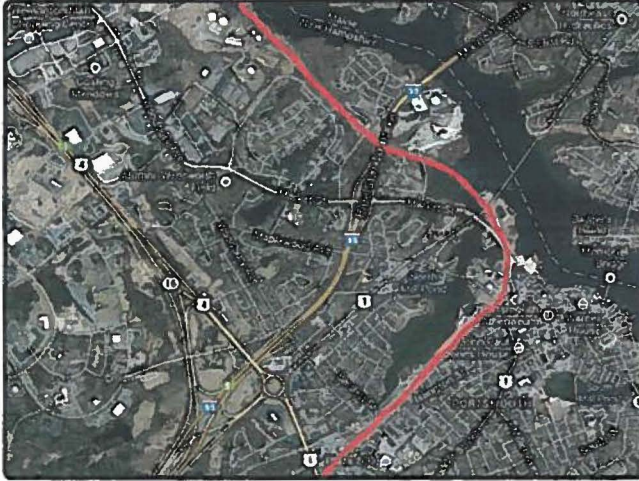
Our primary concern is safety. As you are aware, across the country there has been an increase in accidents involving the transportation of hazardous materials. This has been driven by increased domestic production of energy and its transport across rail infrastructure that in many cases has not been updated or maintained to handle the increased volume and frequency of shipments. Whether it is crude oil or propane, whether it is in New England or in the Midwest, whether it is Sea-3 or another energy company, or whether it is Pan-Am or another railroad operator, the problems are the same: the rail lines, tank cars, and emergency response are inadequate. We in the Seacoast community need to perform the necessary due diligence to make sure this region does not make the same mistakes other regions have made in allowing or not adequately ensuring the safe passage of dangerous substances through populated areas.

On January 23, 2014, the National Transportation Safety Board released a statement in response to recent rail accidents, advising that "planning routes for hazardous materials on trains avoid populated and other sensitive areas." The proposal by Sea-3 does the opposite. It is an exponential increase in shipments of hazardous materials on lines that do not avoid populated and sensitive areas. Derailments lead to spills, fires, or worse, causing extensive property damage, environmental damage, and most importantly the potential for injury or loss of life to residents and workers.

The tracks run through neighborhoods in Stratham and Greenland, across Rt. 33, and towards Portsmouth, and then run along Islington Street with its numerous residents and businesses, next to North Mill Pond, across major intersections of Maplewood, Green Street, and Market Street at the north entrance of downtown, before crossing over the Piscataqua River on an old wooden trestle near the

Sarah Long bridge. The tracks then run right below the Laurel Court development and historic Atlantic Heights neighborhood, Spinnaker Point, and then Osprey's Landing, before continuing up through Newington. As I have just described, there are numerous businesses and neighborhoods along these tracks – from Islington Creek to Noble's Island, the Sheraton Hotel, Harbor Eye Care, and there are plans for new businesses near these tracks, including the Harborcorp development.

Please see below a Google map illustrating the pathway of the tracks.



We are greatly concerned about the safety risks of frequent shipments of propane through these neighborhoods. The tracks are close to homes and businesses and an incident could cause major damage. We are concerned for ourselves, our families and friends, and also for the economic impact to businesses on these tracks, their safety first and foremost.

We ask you to weigh these concerns and incorporate them into your decision. Our belief is that an exemption is not warranted due to the broad regional impact of the proposed expansion.

We request that a safety and security study be conducted to thoroughly research and investigate the regional impact of the expansion and transport of propane by Sea-3 and Pan Am. The purpose of such a study would be to conduct an all-hazards assessment – the impact of the increased rail traffic to all affected towns and road crossings, emergency response plans and capabilities, and determine all improvements necessary to ensure such an increase in propane shipments can be done safely.

Thank you,

Matthew and Erica Nania  
18 Dunlin Way  
Portsmouth, NH 03801

CC: Jane Murray, DES

**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 Matthew and Erica Nania of 18 Dunlin Way, Portsmouth, New Hampshire 03801 (“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 residents of the City of Portsmouth, residing at 18 Dunlin Way, Portsmouth, New Hampshire 03801. 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 February 17, 2015 to the SEC from Richard DiPentima, which is respectfully annexed hereto and incorporated by reference in this Motion to Intervene, as if fully set forth herein. The proposed Intervenors live in a municipality directly adjacent to the municipality in which the Sea 3 expansion project is to be carried out. The

project has already been declared to be of sufficient size and importance as to be a project of regional impact New Hampshire law. The proposed Intervenor's home is located in the 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.

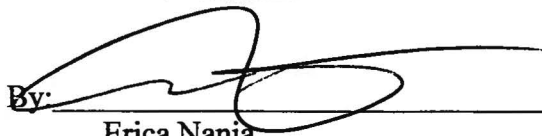
4. The undersigned Intervenor respectfully state that their property rights, and their and others' health, safety and welfare are directly implicated by the Sea 3 expansion, and by the current application before the Site Evaluation Committee of the New Hampshire Public Utilities Commission, warranting status as intervenors and parties before the SEC and in this proceeding. 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,

**MATTHEW NANIA AND ERICA NANIA**

Date: April 19, 2015

By:   
Matthew Nania

By:   
Erica Nania

**CERTIFICATION**

I hereby certify that on this 19th day of April 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