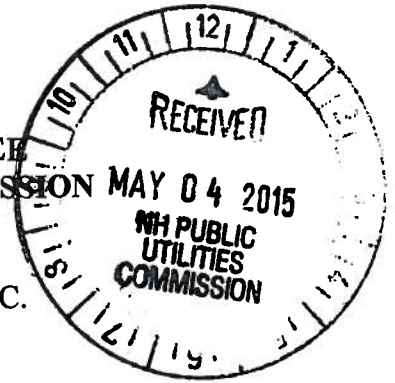


**NEW HAMPSHIRE SITE EVALUATION COMMITTEE
OF THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**



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

SEC Docket No. 2015-01

MOTION TO INTERVENE

NOW COMES Laura G. Byergo of 16 Caswell Drive, Greenland, New Hampshire, 02840 (“Proposed Intervenor”), and respectfully submits 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 Intervenor is resident at 16 Caswell Drive, Greenland, New Hampshire, 03840. The Intervenor is 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 reason that the company’s expansion project is directly dependent on its being able to bring in 12 rail cars of propane per day to store, resell into the New England market, and ship overseas. The new project does not exist without building new berths to receive additional rail cars. This project cannot be considered viable with the connection to the Pan Am rail line


that runs along the southern side of the Great Bay estuary in Greenland. 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 rail line runs across sensitive marshlands, conservation land, and at least two river crossings. Pan Am has so far refused to release to the public its inspection records on the train bridges. If a train were to derail in the estuary it would be very difficult to reach to prevent an explosion in many stretches of the line as there are no roads. If a train derailed crossing a bridge when the tide was out the extensive mud flats would make reaching the wreck very difficult and likewise if the Great Bay were frozen it would be difficult to reach derailed cars in time to prevent an explosion or leakage of unordorized propane.

4. The undersigned Intervenor respectfully states 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 an intervenor and as a party before the SEC and in this proceeding. The Intervenor respectfully requests an Order by the SEC allowing her to proceed as an Intervenor and party, and to receive copies of the all of the relevant filings by the Applicant, and other parties and interested persons.

Respectfully submitted,

LAURA G. BYERGO

Date: May 1, 2015

By:  _____

CERTIFICATION

I hereby certify that on this 1st 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