STATE OF NEW HAMPSHIRE

SITE EVALUATION COMMITTEE

DOCKET NO. 2015-01

SEA-3, INC.'S REQUEST FOR SITE INSPECTION

NOW COMES SEA-3, Inc. ("SEA-3"), through its counsel, Shaines & McEachern, P. A., and requests a site inspection pursuant to Administrative Rule Site 202.13 and in support states as follows:

1. Administrative Rule Site 202.13 provides that, "[t]he committee or subcommittee, as applicable, and public counsel shall conduct a site visit of any property which is the subject of a hearing if requested by a party, or on its own motion, if the committee or subcommittee determines that the site visit will assist the committee or subcommittee in reaching a determination in the hearing."

2. This matter has been scheduled for an adjudicative public hearing on whether SEA-3, Inc.'s request for an exemption from the full certification process of RSA 162-H should be granted for its proposal to construct five additional rail berths at its Newington facility along with associated offloading and refrigeration equipment.

3. SEA-3, Inc. submits that an inspection of its site will assist the subcommittee in reaching a determination in the adjudicative public hearing by allowing it to see for itself the area where the improvements will be located as well as the existing components of the facility and how it is currently operated.

WHEREFORE, SEA-3, Inc. respectfully requests that the Committee:

A. Grant its Request for Site Inspection; and

B. Grant such other and further relief as may be just.

Respectfully submitted,

SEA-3, INC.

By Its Attorneys,

SHAINES & McEACHERN, P. A.

Dated: June 5, 2015   By: _____
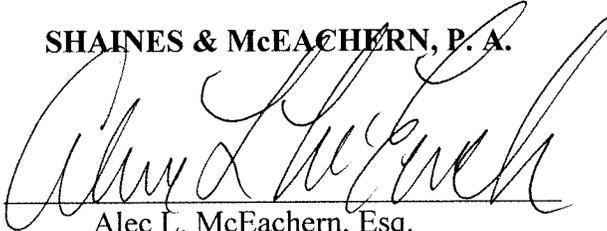   Alec L. McEachern, Esq.
                                            N.H. Bar ID #10568
                                            P.O. Box 360
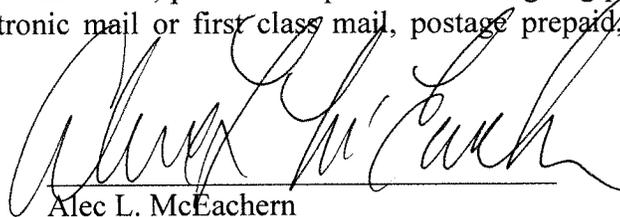   Portsmouth, NH 03802-0360
                                            Phone: (603) 436-3110
                                            Email: alec@shaines.com

Certificate of Service

I certify that I have this 5th day of June 2015, provided copies of the foregoing pleading to all parties to the proceeding by electronic mail or first class mail, postage prepaid, in the United States mail.

_____
Alec L. McEachern

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