

Revd by  
Administrator via  
e-mail on 10/6/2019  
@ 9:12 p.m.  
JGM

**STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

RE: Antrim Level, LLC Petition for Declaratory Ruling or, in the Alternative, Motion for Expedited Approval of Change in Ownership Structure  
SEC Docket Number 2019-03

**MOTION TO INTERVENE OF SHELLEY NELKENS**

Pursuant to New Hampshire Site Evaluation Committee Rules Site 202.11 and RSA 541-A:32, Shelley Nelkens hereby moves for permission to intervene in the above-referenced proceeding. In support of her Motion to Intervene, Shelley Nelkens offers the following arguments:

**1.) Shelley Nelkens can demonstrate a substantial interest which may be affected by the outcome of the proceeding.**

Shelley Nelkens has been a resident and voter of Antrim since 1976 residing at 11 North Main Street, Antrim, NH 03440. As part of her daily routine, Shelley Nelkens walks four to seven times per week on much of the roads and trails in the vicinity of Gregg Lake, Hattie Brown Road, and the Meadow Marsh Trail, all in close proximity to the Tuttle Hill/Willard Mountain turbine site. With degrees in biology and chemistry as well as a lifelong interest and ongoing research into plants and animals of the area, the future of the natural community in the area around the Tuttle Hill/Willard Mountain turbine site is of utmost concern to her. Shelley Nelkens has sensitive hearing issues and is also concerned that the noise propagated by the turbines will prove harmful to her ability to continue her research.

**2.) The interest of Shelley Nelkens will not be adequately protected by other parties.**

In exercising its discretion, Shelley Nelkens respectfully asks that the Committee consider whether her interests will be adequately protected by other parties. Since she, as a frequent user of the natural resources around Gregg Lake, is concerned that her interests have not been fairly addressed thus far by the Town Boards of Antrim, she does not believe that any other party to this proceeding can adequately represent her interests in proceedings before the Committee.

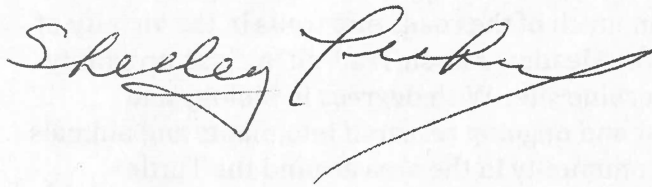
**3.) The intervention of Shelley Nelkens will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.**

Shelley Nelkens testified in previous SEC dockets concerning Antrim Wind, was an approved Intervenor in SEC Docket 2018-03, and thus understands and respects the hearing process.

Pursuant to the SEC Order of September 25, 2019, Shelley Nelkens files this Motion to Intervene by the deadline set forth by the Committee for Docket 2019-03 and requests that she be permitted to intervene with full standing to participate in all phases and activities of the proceeding. Shelley Nelkens respects the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee nor the parties in reaching an outcome. She is prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offers that her participation, if permitted, would be in the interest of justice.

Dated this 2<sup>nd</sup> day of October, 2019.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Shelley Nelkens". The signature is written in black ink and is positioned above the typed name and address.

Shelley Nelkens  
11 North Main Street  
Antrim, New Hampshire 03440  
603-588-2916