

-
- **Maine Workers for a Healthier Environment, Inc.**

John J. Napolitano
BM / FST
UA Local 716
PO Box 496
Augusta, ME 04332-0496

Ms. Susan M. Lessard
Chair, Board of Environmental Protection
C/o Terry Hanson
17 State House Station
Augusta, Maine 04333

April 1, 2010

RE: Calais Project Company, LLC and Calais Pipeline Company, LLC
Site Location of Development Act: #L-24843-26-A-N
Natural Resources Protection Act: #L-24843-TG-B-N;
#L-24843-IW-C-N; #I-24843-I.6-D-N; #L-24843-4P-E-N
Air Emission License: #A-1029-71-A-N
Waste Discharge License: #W-9056-50-A-N

Dear Chairwoman Lessard,

The Petition to Intervene on behalf of Maine Workers for a Healthier Environment, Inc. in the above-listed matter is found behind this cover letter and is being faxed to you today. The signed, original copy of the Petition will be mailed to you as well.

Sincerely,



John J. Napolitano

STATE OF MAINE
BOARD OF ENVIRONMENTAL PROTECTION

IN RE:

CALAIS LNG PROJECT COMPANY, LLC

&

CALAIS PIPELINE COMPANY, LLC

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#L-24843-26-A-N

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MOTION TO INTERVENE
OF
MAINE WORKERS FOR A HEALTHIER
ENVIRONMENT, INC.

Maine Workers for a Healthier Environment, Inc. hereby moves to intervene as a party in the above-listed matter, Calais LNG Project Company, LLC and Calais Pipeline Company, LLC ("Calais LNG"). Under Department's regulations governing hearings on applications of significant public interest, a motion to intervene shall be granted if the petitioner demonstrates that it: (1) has a direct and substantial interest that may be affected by the proceeding; (2) has reasonably specific contentions regarding the subject matter of the hearing and the appropriate statutory criteria; and (3) is prepared and capable of participation in the hearing to support such contentions. See DEP Reg. Ch. 30 §5(A)(1). Maine Workers for a Healthier Environment, Inc. meets these criteria and the Board should therefore grant this petition.

I. **Maine Workers For A Healthier Environment, Inc. Has A Direct And Substantial Interest That May Be Affected By This Proceeding.**

Maine Workers for a Healthier Environment, Inc. ("Maine Workers") is an advocacy group representing the interests of the Maine State Building and Construction Trades Council ("Council"). With approximately 4,000 current members and thousands of retired members, the Council actively supports environmental legislation, regulations and policies that positively impact members' long term health and safety. We have approximately 100 members who reside in Washington County.

Our members have built natural gas fired power boilers and associated fuel handling facilities and installed pollution control equipment for these facilities throughout the State (including in the Towns of Jay, Rumford and Bucksport), which facilities often have displaced older, dirtier (higher emissions) power production units. Hence, they are familiar with the emissions from and pollution control equipment associated with such facilities. Moreover, during facility shutdowns, our members physically perform maintenance work and cleanup activities inside Maine and New England power plants that currently utilize oil, natural gas, biomass and other fuel sources for energy generation, including with regard to pollution control equipment.

Maine Workers supports the movement of these energy producers away from usage of dirty fuel sources (such as fuel oil) and towards cleaner burning natural gas, because Council members will have less exposure to the chemical byproducts found primarily at the plants they currently service that utilize coal, fuel oil, biomass and other combustibles (e.g., tire chips, construction/demolition debris). Calais LNG represents the opportunity to provide those energy producers (current and potential) in the State of Maine a more local and stable supply of natural

gas, and as such, will help ensure the increased health and safety of Maine Workers. Hence, Maine Workers has a direct and substantial interest in Calais LNG that may be affected by this proceeding.

Maine Workers also are very familiar with, and regularly utilize, Best Management Practices regarding construction and reclamation techniques that ensure that project construction and completion is undertaken in a manner that is most protective of the environment. Such techniques will need to be utilized in the areas of pipeline construction through and near sensitive environments (e.g., wetlands), and stormwater management throughout the project footprint.

II. Maine Workers For A Healthier Environment, Inc. Have Reasonably Specific Contentions Regarding The Subject Matter Of The Hearing And The Appropriate Statutory Criteria.

Maine Workers have reviewed the Calais LNG project applications filed with the Maine DEP. While it cannot be certain of the precise subject matters to be covered in any hearing before the Board on these applications, as required by DEP Reg. Ch. 30 §5(A)(1)(b), however, Maine Workers' contentions include, but are not limited to, the following with regard to the proposed Calais LNG project:

- a. The Calais LNG project will not have an unreasonable effect on air quality, water quality, or other natural resources during construction of the facility.
- b. The Calais LNG project will not have an unreasonable effect on air quality, water quality, or other natural resources during operation of the facility
- c. The availability of a reliable source of natural gas from this facility for Maine's and southern New England's industrial and power generation facilities will have a significant positive effect on the regional and statewide air quality of Maine.

III. Maine Workers For A Healthier Environment, Inc. Is Prepared And Capable Of Participation.

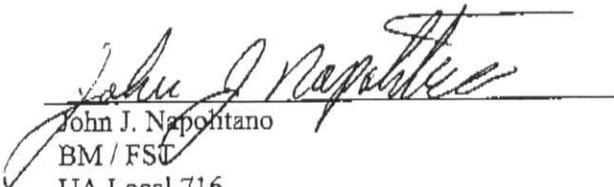
Maine Workers for a Healthier Environment, Inc. will be represented by personnel familiar with this process, and will participate in all pre-hearing conferences and a public hearing held by the Board. It will provide pre-filed testimony and present witnesses at the hearing. Therefore, Maine Workers for a Healthier Environment, Inc. is prepared and capable of participation in the hearing that will support its contentions.

IV. Conclusion

Based on the foregoing, Maine Workers for a Healthier Environment, Inc. has satisfied the requirements for intervention under the Department's regulations for hearings on applications of significant public interest. We respectfully request that this motion to intervene be granted.

DATED: April 1, 2010

Respectfully submitted,



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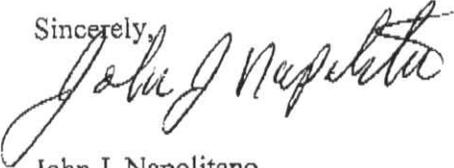
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Dear Chairwoman Lessard,

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Sincerely,

John J. Napolitano