

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**Petition of BNE Energy Inc. for a
Declaratory Ruling for the Location,
Construction and Operation of a 3.2 MW
Wind Renewable Generating Project on
New Haven Road in Prospect,
Connecticut (“Wind Prospect”)**

Petition No. 980

March 8, 2011

**PETITIONER BNE ENERGY INC.’S INTERROGATORY RESPONSES
TO FAIRWINDCT, INC.’S SECOND SET OF INTERROGATORIES**

Petitioner BNE Energy Inc. (“BNE”) submits the following responses to the Second Set of Interrogatories issued by FairwindCT, Inc. dated February 23, 2011.

Q1. On the field review on February 23, 2011, it was obvious that some sort of monitoring wells, test pits, stand pipes and/or deep test holes (the “testing structures”) are present on the Site. Please describe the nature of these structures and state the number of these testing structures on the Site.

A1. As noted in BNE’s petition, BNE is not the owner of the property at 178 New Haven Road (the “Property”). Instead, BNE has an option to purchase the Property. Based on BNE’s discussions with the Property owner, the monitoring wells observed during the field review are percolation tests performed as part of the Property owner’s investigation into the possible development of an approximately 50 home residential subdivision on the Property, which would involve clearing virtually the entire Property. Since BNE is not the owner of the Property, BNE has no additional information.

Q2. Please provide GPS locations for each testing structure.

A2. See response to interrogatory #1.

Q3. How long has each testing structure been located on the Site?

A3. See response to interrogatory #1.

Q4. Name the person or entity who installed each testing structure on the Site.

A4. See response to interrogatory #1.

Q5. Please provide all data collected from each testing structure.

A5. See response to interrogatory #1.

Q6. Did BNE and/or its consultants and/or its witnesses review any of the data collected from each testing structure? If so, please identify the data reviewed and any conclusions drawn from that review.

A6. See response to interrogatory #1.

Q7. If any or all of these testing structures are deep monitoring wells intended to monitor and provide evidence of suitability for septic systems, was a representative from Chesprocott Health District (“Chesprocott”) present during installation? Was Chesprocott otherwise involved in the installation?

A7. See response to interrogatory #1. In addition, BNE would note that this information, if it exists, would be publicly available from the Chesprocott Health District.

Q8. If any or all of these testing structures are deep monitoring wells intended to monitor and provide evidence of suitability for septic systems, has Chesprocott reviewed the data collected?

A8. See response to interrogatory #7.

Q9. If any or all of these testing structures are deep monitoring wells intended to monitor and provide evidence of suitability for septic systems, did BNE and/or its consultants and/or its witnesses review that data before making statements or providing testimony about the suitability of the Site for subdivision into at least 47 residential lots?

A9. See response to interrogatory #7.

BNE ENERGY INC.

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Certification

This is to certify that a copy of the foregoing has been mailed this date to all parties and intervenors of record.

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