## 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

February 23, 2011

## FAIRWINDCT, INC.'S SECOND SET OF INTERROGATORIES TO BNE ENERGY INC.

FairwindCT, Inc. ("FairwindCT") requests that the petitioner, BNE Energy Inc. ("BNE") respond to the following interrogatories:

- 1. 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.
  - 2. Please provide GPS locations for each testing structure.
  - 3. How long has each testing structure been located on the Site?
  - 4. Name the person or entity who installed each testing structure on the Site.
  - 5. Please provide all data collected from each testing structure.
- 6. 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.
- 7. 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?

- 8. 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?
- 9. 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?

By:

Emily A. Gianquinto

Nicholas J. Harding Reid and Riege, P.C.

One Financial Plaza, 21st Floor

Hartford, CT 06103

Tel. (860) 278-1150

Fax. (860) 240-1002

## **CERTIFICATION**

I hereby certify that a copy of the foregoing document was delivered by first-class mail and e-mail to the following service list on the 23rd day of February, 2011:

Carrie L. Larson
Paul Corey
Jeffrey J. Tinley
Hon. Robert J. Chatfield
Thomas J. Donohue, Jr.
John R. Morissette
Christopher R. Bernard
Joaquina Borges King
Eric Bibler
Andrew W. Lord
Cindy Gaudino

Emily Gianquinto