

EXHIBIT 15

MOVE TO STRIKE HIGHLIGHTED
TESTIMONY BELOW

PRE-FILED TESTIMONY OF DR. DAVID J. WILDISH

Q. What is your name?

A. Dr. David Wildish

Q. Where do you live?

A. Hillcrest Farm, Bayside, New Brunswick.

Q. What is your occupation?

A. I am an emeritus research scientist at the Fisheries & Oceans St. Andrews Lab., and an Honorary Research Associate at the Huntsman Marine Science Centre, St. Andrews, New Brunswick.

Q. What is your educational background?

A. I have a B.Sc, Ph.D and D.Sc degrees from the London University, U.K.. My resume and a list of my publications are attached. (CLF/SC 4 & 5)

Q. How long have you been studying or engaging in research in or on Passamaquoddy Bay?

A. Since 1969 and until retirement in 2005

Q. Briefly, how would you describe Passamaquoddy Bay?

A. Passamaquoddy Bay is a small inland sea, of total area of 575 km², which is connected to the Bay of Fundy by the narrow Western and L'Etete passages. It has maximum depths of ~ 80 m and semi-diurnal tides at springs of ~ 8 m (Trites & Garrett, 1983). Freshwater enters PB in four rivers: St. Croix (the largest), Bocabec, Digdeguash and Maguadavic. So at times of freshet the seawater is diluted (annual salinity range 25 to 32 PSU).

Geologically, a fault line runs down the St. Croix estuary and into PB and the area is subject to frequent seismic disturbances, or earthquakes (Burke, 2010). Pockmarks occur in two areas totaling 87 km² with an estimated number of 11,000 (Fader, 1988) near the fault lines. Pockmarks in PB are conical depressions in the seabed, of up to 300m diameter and up to 50 m depth below the seabed. They are hypothesized to be caused by violent releases of naturally occurring liquids or gases in sediments, such as freshwater or methane, perhaps associated with seismic events (Wildish et al, 2008). (CLF/SC - 6)

Historically PB has provided abundant seafood for indigenous peoples. More recent immigrants from Europe have continued this exploitation of marine resources, sometimes excessively. Thus the local groundfishery has been lost and drastic declines in local whales, particularly the right whale, have occurred. Today, PB is a multi-used renewable aquatic resource of considerable direct economic importance to local residents. Multiple uses practiced in Passamaquoddy Bay include:

- recreational activities (whale watching, kayaking, recreational fishing in the sea and freshwater, birding);
- salmon aquaculture;
- commercial fishing, including herring weirs, lobster traps and scallop dragging; and
- municipal waste disposal and assimilation.

In addition we should not forget the indirect benefits of a properly functioning marine environment (e.g., in gaseous regulation of CO₂, O₂, N₂, the water cycle, nutrient re-cycling and organic waste assimilation). Under the currently used economic system these vital services are not valued.

Q. Have you studied impacts or potential impacts of commercial or industrial developments on the natural resources of Passamaquoddy Bay?

I have been involved specifically with salmon aquaculture developments in Passamaquoddy Bay (Wildish et al, 2000) and have conducted benthic surveys there (Wildish et al 2008) and in the St. Croix estuary (Wildish et al 1977).

Q. What were the impacts, potential and/or actual, of that project on Passamaquoddy Bay?

A. The measured impacts of the first fish farm to locate in Passamaquoddy Bay were shown to be extreme in the near field environment. Organic enrichment near the cages developed within the first fish production cycle. Such rapid development of organic enrichment results because the Bay is a natural settling basin (for sediments and organic matter) and it takes little additional organic matter to overload the sediment.

Q. What would be the impact of developing an LNG import and regasification facility in Passamaquoddy Bay?

A. Although I have experience with most pollutants commonly found in the marine and freshwater environments, including oil and dispersants, heavy metals, pesticides, polychlorinated biphenyls, pulp mill effluents and organic wastes from aquaculture (see my publication list), I have none specifically with LNG.

Based on my understanding of the project and my knowledge of Passamaquoddy Bay, possible effects would include:

- increased large vessel traffic interfering with tourism and fishing vessel traffic;
- propwash from large vessels will interfere with the shallow benthic environment; and
- accidental release of LNG or oil as a result of collisions or seismic activity.

Q. Could you elaborate as to those risks?

A. The narrow passages and shallow bottoms through which large LNG vessels will operate will make transits through Passamaquoddy Bay and the St. Croix estuary hazardous. This coupled with the existing traffic from tourism, commercial fishing and salmon aquaculture will mean that the probability of vessel collision is much increased.

Propwash from large LNG vessels will “blow away” sediments from directly beneath their hulls in Passamaquoddy Bay and St. Croix estuary where they transit, and this will result in losses of benthic productivity. Since this productivity supports groundfish and lobsters, propwash effects will be directly harmful to fishermen.

The increased likelihood of collisions due either to natural hazards or vessel collisions has already been outlined. As described earlier, Passamaquoddy Bay frequently experiences earthquakes and a fault line runs up the St. Croix estuary. Transiting LNG vessels will pass right over one of the pockmark fields (marked habitat B in Wildish et al 2008) and over the fault line in the St. Croix estuary. The earthquake “natural hazard” poses additional, but largely unknown problems for LNG development, particularly at the terminal.

With regard to spills of oil the disastrous effects to marine wildlife are well known. By contrast spills of LNG in the marine environment, for instance due to an earthquake causing a ruptured pipe at the terminal, have not been well studied.

Q. What is your opinion on the appropriateness of industrial development in Passamaquoddy Bay?

A. Odum (1971) described the United States coastal zone as consisting of one of four types: protective (of mature ecosystems warranting special conservation), productive

ecosystems, multiply used systems and areas used only for urban-industrial use. These use patterns are arranged in order of increasing human intervention, with the fourth category so compromised ecologically that uses are limited to industrial activity. In my opinion the introduction of LNG processing into Passamaquoddy Bay will present unacceptably high risks for the current multiple uses as described above and will drive Passamaquoddy Bay towards Odum's fourth category of urban-industrial use only.

References

Burke, KBS. 2010. Historical Earthquakes Felt in New Brunswick (1764,1811 – 1960), Fredericton.

Fader, GBJ. 1988. Cruise Report M.V. Navicula, Passamaquoddy Bay and Bay of Fundy. Geological Survey of Canada, Open File Report 88-018(C), Phase 4 and 5M, Bedford Institute of Oceanography, Dartmouth, nova Scotia.

Odum, E.P. 1971. Fundamentals of Ecology. Third edition. W.B.Saunders , Philadelphia. 574 p.

Trites,RW and Garrett, CJ. 1983. Physical oceanography of the Quoddy Region. In: Thomas MLH (ed) Marine and Coastal Systems of the Quoddy region, New Brunswick.. Can Spec Publ Fish Aquat Sci 64: 9 – 34.

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Wildish, DJ, Akagi, HM, McKeown, DL and Pohle, GW. 2008 Pockmarks influence benthic communities in Passamaquoddy Bay, Bay of Fundy, Canada. Mar Ecol Prog Ser 357: 51 – 66.

Wildish, DJ, Akagi, HM and Hamilton, N. 2000. Interfacial geochemistry and macrofauna at a new salmon farm in Passamaquoddy Bay, Bay of Fundy. Can Tech Rep Fish Aquat Sci. No. 2514, 40pp.

Personally appeared before me the above-named David Wildish and made an oath that the foregoing is true and accurate to the best of her knowledge and belief.

Dated: 1 June 2010

David Wildish
David Wildish

Notary:

David A. Bartlett 

64 King Street
Saint Andrews, NB
Canada E5B 1Y3

Commission expires: When I cease to be
a practising member of the Law Society
of New Brunswick

EXHIBIT 16

STATE OF MAINE
BOARD OF ENVIRONMENTAL PROTECTION

* * * * *

IN RE: Applications by Downeast LNG, Inc.,
and Downeast Pipeline LLC to
construct a liquefied natural gas
import terminal in Robbinston and a
pipeline project in Robbinston,
Calais, Baring Plantation, Baileyville
and Princeton

* * * * *

PRESIDING OFFICER: VIRGINIA PLUMMER, CHAIRWOMAN

This hearing was held pursuant to Notice at Calais
High School, Red Devil Drive, Calais, Maine, on
July 19, 2007, beginning at 8:10 a.m.

1 the 25th slide. Number 2 is different and it's
2 just a different statement. I think for
3 consistency the witness --

4 MR. GOUDEY: This would be on essentially
5 the slide before my conclusions on the
6 presentation. It's at the end of the graphics.

7 CHAIRWOMAN PLUMMER: The next to the last
8 page.

9 MR. MANAHAN: My number 2 is different than
10 this number 2. It's a different sentence -- oh, I
11 see. It's very similar. That's fine. I see. I
12 couldn't read it. You were standing in the way.
13 I apologize, that's fine.

14 MR. GOUDEY: I'm sorry. This is what the
15 Board needs in order to judge the significance of
16 the points that I've been making. What I've done
17 is very preliminary work. We need to understand
18 the consequences of the tidal range, what ledge
19 areas become hazards and what simply aren't, but
20 most importantly we need to understand and this
21 information has not been made available to me and
22 even if it was, this structural analysis of the
23 consequences of grounding is a very specialized
24 field in naval architecture. I wouldn't do it but
25 I know people who can and can look at this and

1 determine what the consequences are of a ship
2 ending up on a rocky prominence and then the tide
3 dropping out 20 to 25 feet, what's going to happen
4 to the ship. In my estimation it's going to be a
5 severe consequence resulting in the loss of
6 cargo.

7 The other point that I wanted to cover which
8 was discussed in my -- in my rebuttal pre-filed
9 submissions deal with the speed of transit and the
10 problems associated with user interference from
11 the passage of the security zones. The security
12 zone -- the security zone as we best understand it
13 and I don't believe it's been defined in any -- in
14 any definite way is two miles ahead of the ship as
15 it's coming in, one mile astern, 500 yards to
16 either side. I have a neat little graphic that I
17 would love to show you but I shan't. It shows
18 this oblong shape passing up through Northwest
19 Passage and up into the area that's been
20 identified as being the primary lobstering area.
21 This shape -- to combined length front of that
22 security zone to the rear of the security zone is
23 about 3.2 miles. You have to include the length
24 of the ship if I read the letter of the law
25 correctly. That is a length about this long,

1 understand you to say that you are not an expert
2 on ship hogging?

3 MR. GOUDEY: What I said was I am not -- my
4 specialty within naval architecture is not ship
5 structures.

6 MR. GOODALL: So you don't know if an LNG
7 ship were hung up on a different ledge that was
8 with shallow water would actually cause the ship
9 to hog?

10 MR. GOUDEY: Well, hog is a condition of
11 stress. Failure due to hogging is a different
12 story. If it is supported simply by the mid ships
13 in a narrow area, the ship would definitely be
14 under what we would call hogging stress. Whether
15 it cracks, whether it fails, whether it breaks in
16 two pieces depends upon the detail of the ship and
17 how far the ends are unsupported.

18 MR. GOODALL: And you've not made any --
19 given any testimony regarding the nature of LNG
20 ships to whether or not they would hog under these
21 circumstances?

22 MR. GOUDEY: If one were to do an analysis,
23 one would want to know the specific ship because
24 it would vary among ships, among ship designs.

25 MR. GOODALL: Now, is it fair to say that

1 point presentation that you have, much of that
2 analysis was derived by a more detailed analysis
3 done by Professor Fay also from MIT.

4 CHAIRWOMAN PLUMMER: We can't discuss Dr.
5 Fay's testimony. It's stricken.

6 MR. GOUDEY: I simply want to state that
7 atmospheric diffusion is not my field, but I have
8 studied this and I feel that I can comment on it
9 in a useful way for you. When a -- when an
10 accident like this occurs, if there's a hole in
11 the ship that penetrates the outer hull and the
12 inner hull, LNG will begin to spill. The size of
13 the hole depends on the rate at which it comes
14 out. The rate at which it comes out combined with
15 the evaporation rate determines the size of the
16 spill that will occur. Now, there's two ways to
17 look at the resulting situation, does it ignite or
18 doesn't it ignite. If it ignites, you have a
19 fire. The size of that fire depends on the rate
20 at which the LNG is coming out of the tank and
21 many things are going to affect that, not the
22 least of which is the size and the shape of the
23 hole, the location of the hole with respect to the
24 water, the location of the hole with respect to
25 the level of the LNG in the tank. It's a very

EXHIBIT 17

**MOVE TO STRIKE HIGHLIGHTED
TESTIMONY BELOW**

PRE-FILED TESTIMONY OF VAUGHN F. MCINTYRE

Q. What is your name?

A. Vaughn F. McIntyre.

Q. Where do you live?

A. 375 Water Street in St Andrews.

Q. How long have you lived there?

A. I have lived at the current address for 3 years but in St Andrews for 9 years.

Q. What do you do for a living?

A. I am a business, development and fundraising Consultant working for tourism-related businesses and government. I specifically focus on long-term development in these areas. A copy of my CV is attached as SPB-25.

I have assisted a number of organizations in the Northeast Atlantic Region over the past 10 years, working with them in executive capacities to attract investments and new markets.

Some of my current clients and what I do for them include:

- Town of St Andrews (Cruise ship marketing and development with Campobello Island, Eastport, and Cruise Maine)
- St Andrews Tourism Partnership (Tourism and event development; encourages cross-Bay relationships and events, including the upcoming fourth-annual “Two-Countries One Bay Art Studio Event”)
- Town of Quispamsis (Capital and community fundraising campaign)
- Atlantic Hydrogen (Marketing and branding)
- Sherwood and Flanagan (Website and business development consulting for law firm)

Previous clients include a major software company in the forestry business and a software company in the oil and gas drilling industry.

In a volunteer and community capacity, I currently sit on the board of directors of the Heather Curling club (Draw master men’s competitive division) and the Huntsman Ocean Sciences, (chair of the education committee). I am also a previous member of the board of directors of Sunbury Shores Arts and Nature and the previous President of the Algonquin Golf Club.

Q. Are you familiar with the Calais LNG proposal?

A. Yes. I understand that it is one of two different proposals for LNG import terminals currently proposed for the Passamaquoddy Bay area, to be sited in Calais, Maine.

Q. Would that affect the Passamaquoddy Bay Area in both Maine and New Brunswick?

A. The placement of an LNG terminal in Passamaquoddy Bay or along the St Croix River would have a major negative impact on several fronts, all applicable to either Maine or New Brunswick, but perhaps more so to Maine because the impacts to Maine would be more direct.

Q. Please explain how.

A. LNG in the Bay would affect resource-based businesses from several standpoints including:

From a General Tourism Standpoint:

While the region is constantly trying to expand the tourism season into a 12-months-a-year business, the reality of the situation is that the tourism industry currently directs a major amount of money generated during the 6 major tourism months of May through October. With the advent of shipping traffic from LNG tankers, and their inherent need for secure perimeters during transit and docking, industries like fishing, whale watching, elder hostels, seafood restaurants, and the like would, in my opinion, see their operations reduced by more than 25%. This would take them from marginally profitable, at best, to annual losses that would put many of them out of business.

Passamaquoddy Bay is not an element that can be claimed as two separate pieces that do not connect. Maine and New Brunswick share the Bay with a First Nation tribe, and its existing culture of fishing and tourism goes back more than 400 years. We have to build on that structure to ensure the area's real and sustainable vitality. More importantly, and as explained in more detail below, the Bay's economic growth must be consistent with its existing natural and cultural resources.

From a Cultural Standpoint:

Recently the town of Eastport and the communities on both sides of the Bay have begun an important effort to cooperate in marketing the Passamaquoddy Bay area as a historically and ecologically unique and globally significant attraction. This area is known as one of the "New 7

Wonders of the World” because of its natural setting and natural resources that are found only here, including the world’s biggest tides, whales, teeming wildlife, island archipelago, and natural beauty that all combine to form a truly unique setting. Cruise Maine and the Atlantic Cruise Ship Association just signed a significant and regionally important agreement to jointly market the Bay. The Calais LNG Project and its related disruption of shipping and ship schedules would imperil this important and sustainable effort to bring cruise liners to Eastport and other Passamaquoddy Bay communities. Cruise ships have to maintain a schedule, especially if they are to visit Eastport, Campobello Island, St. Andrews and other features in Passamaquoddy Bay.

LNG facilities in Passamaquoddy Bay are not consistent with the area’s natural and cultural resources. Industry is vital and needed, but it has to be consistent with and fit into the larger area – it must be part of the larger community. In my opinion, an LNG facility will create schisms in the community and have a potentially devastating impact on the health of many natural resource-based businesses, and pit family members against each other as they grapple with economic conflicts.

LNG in my mind is a natural resource and cultural disaster (some would argue cultural genocide) the moment it gets the green light. It will not take any time for the negative impact to be felt by people, businesses and by extension, governments, on both sides of the border.

Q. Do cruise ships and other tourist ships presently visit the Passamaquoddy Bay Region?

A. Yes. It is presently a nascent industry and has enormous potential for growth. Cruise West is going into Eastport in September 2010. There was a cruise-ship industry in St. Andrews in the 1990s, but no major cruise ship business since then. However, discussions going on with at least two cruise lines have led to secured visits in 2012 and potential visits in 2011. Please see the cruise brochure, including the Eastport insert, attached to my testimony as SPB-26.

Also, the Tall Ship “The Bounty” will come into the St. Andrews Wharf in October 2010, and we expect Tall Ships to appear more frequently in the future.

Q. Do you have anything to add about the cruise ship industry in Passamaquoddy Bay?

A. The cruise ship industry is the fastest growing tourism sector. The Atlantic Coast is one of the most up-and-coming regions for this growth to take place. With the decline in the state of Alaska markets is the opportunity for new destinations such as Eastport, Maine and St. Andrews/Campobello Island, New Brunswick. Canada’s entry of the Bay of Fundy in the “New 7 Wonders of the World”

contest is generating enormous potential for a great deal of tourism in Passamaquoddy Bay, especially by cruise ships in the next 10 years. This stands in contrast to entry of a heavy industry such as LNG.

Two of the key decision criteria for cruise lines are the ability to schedule and the safety and security of the port. The three or four tug boats surrounding LNG tankers along with armed security escorts are visible signs of the terrorist threats and insecurity that go with a cargo such as LNG, and is wholly contrary to the safety and security sought by cruise line passengers. The tankers likewise create problems for the scheduling of a cruise ship's ability to reach a destination such as Eastport in time to allow passengers time to shop, eat at restaurants, and enjoy cultural amenities.

What has been revealed is that the communities along the Bay have been working for centuries in synchronization to their mutual benefit for over 400 years. The cruise ship industry could be part of this synchronization, or put another way, working with the resources we have for real, sustainable growth.

Q. How do you reach this conclusion?

A. When approaching any business to determine its suitability to the market, one must look at three elements: infrastructure, content, and context. If you compare a commercial LNG facility in the bay to cruise ships the following elements jump out.

Infrastructure: I understand that LNG tankers are largely prop and rudder technology, over 1000 feet long and 200 feet or more wide. Ships that size are difficult to maneuver in tight confines and require several tugs boats for assistance. If accidents happen, the surrounding shores and waters and their ecology can be highly impacted. This is not consistent with present uses of the Bay's natural resources.

In contrast, most modern cruise ships are multi-thruster bow and stern propulsion systems approximately 3/4 the length and 1/2 the width of LNG tankers. Cruise ships are highly maneuverable. They do not require "escort" gun boats and they do not demand safe passage and perimeter clearances.

Content: LNG tankers carry highly volatile gas destined for markets "down the road." With no human properties, LNG neither cares about the port or spends any incremental money, nor is it destined to return again. In contrast, cruise ships carry mostly high-net-worth people who want to touch and feel the destination, spend some money and frequently return as land passengers to spend more time and money.

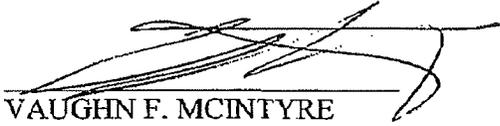
Context: Cruise ships are consistent with existing uses of the Bay and they rely on the Bay's natural resources to attract patrons. They are the fastest growing tourism segment, bringing thousands of passengers and dollars to the region in the form of new money as well as spinoff businesses, in addition to taking advantage of old businesses such whale watching. Cruise ships are noise-free businesses unless you count the noise of the cash registers. The night sky will not be impacted as cruise ships are out to sea before darkness sets.

Trying to tie a positive context for the presence of LNG on the beautiful coast of the Bay is a stretch. It is an energy market not present in the area, a volatile gas that could destroy the bay's environment by leak, explosion, or by shipping error, and is incompatible with the current businesses in the area (fishing, tourism, education).

LNG facilities need to be built, well lit and secure, and are likely to create industrial noise similar to industrial sites. An LNG port has only the potential to destroy all that is currently in place.

Q. Do you have anything else that you would like to add?

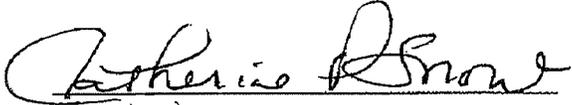
A. Yes, absolutely. As a professional marketing and planning consultant, it is my opinion that LNG would reverse recent and potential gains made by resource-based businesses, and would be a severe detriment to long-standing resource-based business in the Passamaquoddy Bay area. As detailed above, these resource-based industries include fishing, tours, tourism, cruise ships, and related businesses. With all of my experience, I cannot help but offer the opinion that LNG would take over the Bay and that stopping this type of development is critical to preservation and growth of resource-based industries


VAUGHN F. MCINTYRE

Province of New Brunswick
County of Charlotte

Date: 27 MAY 2010

Signed and sworn to before me this 27 day of May, 2010 by VAUGHN F. MCINTYRE.


(signature)

Catherine P. Snow
(printed name)
Notary Public Com. of Oaths
My commission expires: Dec. 31/12

CATHERINE P. SNOW
A COMMISSIONER OF OATHS
MY COMMISSION EXPIRES
DECEMBER 31, 2012