

June 9, 2014

**Via Electronic Filing**

Rosemary Chiavetta, Esquire  
Secretary  
PA Public Utility Commission  
Commonwealth Keystone Building, 2 North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Docket No.: P-2014-2411966  
Amended Petition of Sunoco Pipeline LP  
East Goshen Township - Petition to Intervene**

Dear Secretary Chiavetta:

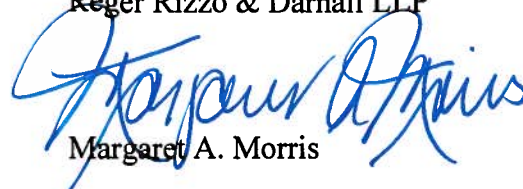
Attached for filing is the Petition to Intervene of East Goshen Township (East Goshen) in the above captioned proceedings.

As indicated on the attached Certificate of Service, a copy of East Goshen's Petition to Intervene has been provided to the service list in the manner indicated.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/jmm  
Enclosure

cc: Louis F. Smith, Manager, East Goshen Township [w/enc.]  
Kristin S. Camp, Esquire, Buckley Brion McGuire & Morris LLP [w/enc.]



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Docket Number:	P-2014-2411966
Description:	Amended Petition of Sunoco LP
Transmission Date:	6/9/2014 3:45:10 PM
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### Uploaded File List

File Name	Document Class	Document Type
EGT Petition to Intervene.pdf	Other Filing	Petition to Intervene

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**Re: Docket No.: P-2014-2411966  
Amended Petition of Sunoco Pipeline LP  
East Goshen Township - Petition to Intervene**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons on the attached service list, in the manner indicated, in accordance with the requirements of §1.54 (relating to service by a participant).

Dated: June 9, 2014

  
\_\_\_\_\_  
Margaret A. Morris, Esq.

**Re: Docket No. P-2014-2411966  
Amended Petition of Sunoco Pipeline LP  
East Goshen Township - Petition to Intervene**

**SERVICE LIST**

**VIA ELECTRONIC MAIL**

Christopher A. Lewis, Esq.  
Blank Rome LLP  
One Logan Square  
Philadelphia, PA 19103  
[Lewis@BlankRome.com](mailto:Lewis@BlankRome.com)

**VIA FIRST CLASS MAIL**

Hon. Elizabeth H. Barnes  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Hon. David A. Salapa  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

John R. Evans, Esquire  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

David Hoover, Supervisor  
Cambria Township Board Supervisors  
184 Municipal Road  
Ebensburg, PA 15391

Tanya McCloskey, Esquire  
Aron J. Beatty, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place - 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1921

Dennis Simmers, Chairman  
Cambria Township Planning Commission  
P.O. Box 248  
Revloc, PA 15948

Johnnie Simms, Esquire  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120

David E. Burchfield, Jr., Chairman  
Allegheny Township Board of Supervisors  
3131 Colonial Drive  
Duncansville, PA 16635

Robert Zundell, Chairman  
Salem Township Board of Supervisors  
244 Congruity Road  
Greensburg, PA 15601

Bruce J Pergament, Supervisor  
Penn Township Board of Supervisors  
12281 Redstone Ridge Road  
Hesston, PA 16647

Judith A. Hicks, Chairwoman  
Shirley Township Board of Supervisors  
15480 Croghan Pike  
Shirleysburg, PA 17260

Lynn Cain  
Salem Township Planning Commission  
244 Congruity Road  
Greensburg, PA 15601

John McGarvey, Chair  
Shirley Township Planning Commission  
15480 Croghan Pike  
Shirleysburg, PA 17260

Tony Distefano, Supervisor  
Burrell Township Board of Supervisors  
321 Park Drive  
Blacklick, PA 15716

James J. Henry, Chairman  
Toboyne Township Board of Supervisors  
50 Lower Buck Ridge Road  
Blain, PA 17006

Kenneth A. Umholtz, Chairman  
E. Wheatfield Board of Supervisors  
1114 Rt. 56  
East Armagh, PA 15920

James H. Turner, Chairman  
Tri-County Regional Planning Commission  
Dauphin County Veterans Memorial Building  
112 Market Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17101

James Burkholder, Jr., Chairman  
Lower Frankford Township  
Board of Supervisors  
1205 Easy Road  
Carlisle, PA 17015

Jacque A. Smith, Chairman  
West Cocalico Township Board of  
Supervisors  
P.O. Box 244  
Reinholds, PA 17569

Craig Houston, Chairman  
Lower Frankford Township Planning  
Commission  
1205 Easy Rd.  
Carlisle, PA 17015

Leon Eby, Chairman  
West Cocalico Township Planning  
Commission  
P.O. Box 244  
Reinholds, PA 17569

Al Bienstock, President  
Hampden Township Board of  
Commissioners  
230 South Sporting Hill Rd.  
Mechanicsburg, PA 17050

James R. Oswald, Chairman  
Spring Township Planning Commission  
2850 Windmill Rd.  
Sinking Spring, PA 19608

Philip Klotz, Chairman  
Hampden Township Planning Commission  
230 South Sporting Hill Rd.  
Mechanicsburg, PA 17050

Jeffrey M. Fiant, Chairman  
Brecknock Township Board of Supervisors  
889 Alleghenyville Rd.  
Mohnton, PA 19540

Ronald Kopp, Chairman  
Londonderry Township Board of  
Supervisors  
783 S. Geyers Church Rd.  
Middletown, PA 17057

John R. Burger, Chairman  
Brecknock Township Planning Commission  
889 Alleghenyville Rd.  
Mohnton, PA 19540

Carolyn Akers, Chair  
Londonderry Township Planning  
Commission  
783 S. Geyers Church Rd.  
Middletown, PA 17057

Russell L. Gible, Chairman  
West Cornwall Township Board of  
Supervisors  
73 South Zinns Mill Rd.  
Lebanon, PA 17042

Dewey Yoder  
West Cornwall Township Planning  
Commission  
73 South Zinns Mill Rd.  
Lebanon, PA 17042

Patricia B. McIlvaine, Chair  
West Goshen Township Board of  
Supervisors  
1025 Paoli Pike  
West Chester, PA 19380

Monica Drowniany, Chair  
West Goshen Township Planning  
Commission  
1025 Paoli Pike  
West Chester, PA 19380

Michael Gaudiuso, President  
Upper Chichester Board of Commissioners  
P.O. Box 2187  
Upper Chichester, PA 19061

James Renner, Chairman  
Upper Chichester Planning Commission  
P.O. Box 2187  
Upper Chichester, PA 19061

Jodi Noble, Township Manager  
Chartiers Township  
2 Buccaneer Dr.  
Houston, PA 15342

Catherine A. Tomlinson, Chair  
Upper Uwchlan Township Board of  
Supervisors  
140 Pottstown Pike  
Chester Springs, PA 19425

Robert J. Schoenberger, Chair  
Upper Uwchlan Township Planning  
Commission  
140 Pottstown Pike  
Chester Springs, PA 19425

Carl DeiCas, Chair  
Union Township Board of Supervisors  
3904 Finleyville-Elrama Road  
Finleyville, PA 15332

Tamira Spedaliere, Township Planner  
Rostraver Township  
201 Municipal Drive  
Belle Vernon, PA 15012

Douglas Weimer, Chairman  
Hempfield Township Board of Supervisors  
1132 Woodward Drive, Suite A  
Greensburg, PA 15601-9310

Phil Shelapinsky, Chairperson  
Hempfield Township Planning Commission  
1132 Woodward Drive, Suite A  
Greensburg, PA 15601-9310

Bruce Light, Township Manager  
Penn Township  
2001 Municipal Court  
Harrison City, PA 15636-1349

Phillip Miller, Chairman  
Penn Township Planning Commission  
2001 Municipal Court  
Harrison City, PA 15636-1349

Thomas L. Mehaffie III, President  
Lower Swatara Township Board  
1499 Spring Garden Drive  
Middletown, PA 17057

Lee Nickovich, Chairman  
Chartiers Township Planning Commission  
2 Buccaneer Dr.  
Houston, PA 15342

Vincent DeCario, Chairman  
Derry Township Board of Supervisors  
5231 Route 982  
Derry, PA 15627

Frank Siffrinn, Township Manager  
North Strabane Township  
1929 Route 519  
Canonsburg, PA 15317

George Henry, Chairman  
Frankstown Township Board of Supervisors  
2122 Frankstown Road  
Hollidaysburg, PA 16648

Robert Balogh, Chairman  
North Strabane Township  
1929 Route 519  
Canonsburg, PA 15317

Chauncey D. Knopp  
Lower Swatara Township Planning  
Commission  
1499 Spring Garden Drive  
Middletown, PA 17057

Andrew Tullai, Chairman  
Union Township Board of Supervisors  
3904 Finleyville-Elrama Road  
Finleyville, PA 15332

Patti Smith  
Spring Township Board of Supervisors  
2850 Windmill Rd.  
Sinking Spring, PA 19608

Harry Kelso, Chairman  
North Middleton Township Board of  
Supervisors  
2051 Spring Road  
Carlisle, PA 17013

Rob Jones, Chairman  
Wallace Township Board of Supervisors  
P.O. Box 670  
Glenn Moore, PA 19343

Robert P. Stanley, Jr.  
Fairview Township Board of Supervisors  
599 Lewisberry Road  
New Cumberland, PA 17070

John Frommeyer, Chairman  
Wallace Township Planning Commission  
1250 Creek Road  
P.O. Box 670  
Glenn Moore, Pa 19343

Michael A. Powers  
Fairview Township Planning Commission  
599 Lewisberry Road  
New Cumberland, PA 17070

Anthony Gallagher  
Steamfitters Local Union 420  
14420 Townsend Road Suite A  
Philadelphia, PA 19154

Russell L. Gibble, Chairman  
West Cornwall Township  
Board of Supervisors  
73 South Zinns Mill Road  
Lebanon, PA 17042

Senator John Wozniak  
Senate Box 203035  
The State Capitol  
Harrisburg, PA 17120

Paul A. Mullen  
3729 Chichester Avenue  
Boothwyn, PA 19062-3135  
**Representing Local Union No 654**

Representative Frank Burns  
House of Representatives  
PW Box 202072  
Harrisburg, PA 17120-2072



Michael Gaudiuso, President  
Upper Chichester Board of Commissioners  
P.O. Box 2187  
Upper Chichester, PA 19061

Scott J. Rubin, Esquire  
333 Oak Lane  
Bloomsburg, PA 17815  
**Representing Concerned Citizens of West  
Goshen Township**

Augusta Wilson, Esquire  
Joseph O. Minott, Esquire  
135 S. 19<sup>th</sup> Street  
Suite 300  
Philadelphia, PA 19103  
**Representing Clean Air Council**

Lynda Farrell  
Pipeline Safety Coalition  
331 Norwood Road  
Downingtown, PA 19335

Lori Kier  
619 Marydell Drive  
West Chester, PA 19380

Ralph E. Hyatt  
1266 Delmar Ave.  
West Chester, PA 19380-4027

Senator Andy Dinniman  
19<sup>th</sup> District  
One North Church Street  
West Chester, PA 19380

Senator John C. Rafferty Jr.  
44<sup>th</sup> District  
3818 Germantown Pike  
Collegeville, PA 19426

Aaron Stemplewicz, Esquire  
925 Canal Street  
Suite 3701  
Bristol, PA 19007  
**Representing Delaware River Keeper  
Network**

Mayor Gene Taylor  
Borough of Marcus Hook  
10<sup>th</sup> & Green Streets  
Marcus Hook, PA 19061

Douglas R. Lengenfelder, President  
Cambria County Comissioners Office  
200 South Center Street  
Ebensburg, PA 15931

Thomas C. Chernisky  
Office of County Commissioners  
200 South Center Street  
Ebensburg, PA 15931

Diane & Scott Dombach  
Marjory Diane Dombach  
402 Burgner's Road  
Carlisle, PA 17015

Senator Patricia H. Vance  
31<sup>st</sup> Disctric  
3806 Market Street  
Camphill, PA 17011

Representative Stephen E. Barrar  
House of Representatives  
18 East Wing  
PO Box 202160  
Harrisburg, PA 17120-2160

Brian Mercadante  
Borough of Marcus Hook  
10<sup>th</sup> & Green Streets  
Marcus Hook, Pa 19061

Barry Coniglio  
537 Mantua Avenue  
Route 45  
Woodbury, NJ 08096  
**Representing C&C Supply Company**

Mark J. Wissinger, Safety Officer  
Office of County Commissioners  
200 South Center Street  
Ebensburg, PA 15931

Carol N. Tompkins  
1245 Victoria Lane  
West Chester, PA 19380

Christian Kier  
619 Marydell Drive  
West Chester, PA 19380

Walker C. Tompkins  
1245 Victoria Lane  
West Chester, PA 19308

Representative Rick Saccone  
39<sup>th</sup> District  
PO Box 202039  
Harrisburg, PA 17120-2039

Senator Dominic Pileggi  
9<sup>th</sup> District  
350 Main Capitol Building  
Harrisburg, PA 17120-3009

David R. Yoder, Esquire  
Law Offices of David R. Yoder  
PO Box 215  
Carlisle, PA 17013  
**Representing Rolfe & Doris Blume,  
David & Faith Fertig**

Bud Burns  
Scheck Mechanical Corporation  
4009 Market Sreet  
Suite H  
Aston, PA 19014

Craig Hahnlen  
185 Woodbine Drive  
Hershey, PA 17033

John & Susan Rapp  
1239 Victoria Lane  
West Chester, PA 19380

Nick Garavelas  
Service Painting, Inc.  
200 Price Street  
PO Box 433  
Trainer, PA 19061

Jody Ross, M.D.  
437 Nye Road  
Hummelstown, PA 17036

Adam Kron, Esquire  
1000 Vermont Ave. NW  
Suite 1100  
Washington DC 20005  
**Representing Environmental Integrity Project**

Dennis Rochford  
240 Cherry Street  
Philadelphia, PA 19106-1906  
**Representing Maritime Exchange For The  
Delaware River and Bay**

Nick Kennedy, Esquire  
1414-B Indian Creek Valley Road  
PO Box 408  
Melcroft, PA 15462  
**Representing Mountain Watershed  
Association**

Timothy J. Brink  
2250 Hickory Road  
Suite 100  
Plymouth Meeting, Pa 19462  
**Representing Mechanical & Service  
Contractors Associations of Eastern  
Pennsylvania & Greater Delaware Valley**

Gene Barr  
Pennsylvania Chamber of Business and  
Industry  
417 Walnut Street  
Harrisburg, PA 17101

Edward Hargraves  
2522 Metropolitan Drive  
PO Box 28  
Trevose, PA 19053-0028  
**Representing SDA Mechanical Services Inc**

Christopher J. Kemmer  
201 Fulton Street  
Chester, PA 19013

Duncan Neilson  
Energy Products Co  
PO Box 809  
3970 Washington Road  
McMurray, PA 15317

Mary Leitch  
526 Reed Street  
Philadelphia, PA 19147

Wayne Norris  
Dura-Bond Coating Inc  
Post Office Drawer 518  
2658 Puckety Drive  
Export, PA 15632

William E. Knowles Jr.  
2 Flamingo Road  
Hatboro, PA 19040

John Occhipinti  
575 Mountain Avenue  
Murray Hill, NJ 07974  
**Representing The Linde Group**

Robert J. Shoenberger  
Upper Uwchlan Township  
140 Pottstown Pike  
Chester Springs, PA 19425

Representative William F. Keller  
House of Representatives  
PO Box 202184  
Harrisburg, PA 17120-2184

Chad Amond  
Westmoreland Chamber of Commerce  
241 Tollgate Hill Road  
Greensburg, PA 15601

Brett Saddler  
3301 Green Street  
Suite 356  
Claymont, DE 19703  
**Representing The Claymont Renaissance  
Development Corporation**

Joseph P. Kirk  
425 Donner Avenue  
Suite 410  
Monessen, PA 15062  
**Representing The Mon Valley Progress  
Council**

Jeff M. Kotula  
Washington County Chamber of Commerce  
375 Southpointe Blvd.  
Suite 240  
Canonsburg, PA 15317

James J. White Jr.  
J J White Incorporated  
5500 Bingham Street  
Philadelphia, PA 19120

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Amended Petition of Sunoco Pipeline LP for a	:	
Finding For a Finding that the Situation of	:	West Goshen Township, Chester County
Structures To Shelter Pump Stations and	:	(Docket No. P-2014-2411966)
Valve Control Is Reasonably	:	
Necessary for the Convenience Or Welfare	:	
of the Public	:	

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**PETITION TO INTERVENE OF  
THE BOARD OF SUPERVISORS OF EAST GOSHEN TOWNSHIP  
TO THE AMENDED PETITION OF SUNOCO PIPELINE, L.P.**

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The Board of Supervisors of East Goshen Township (EGT), by and through its undersigned attorneys, pursuant to 52 Pa. Code §§ 5.71-76 and in accordance with the Notice published in the *Pennsylvania Bulletin* at 44 Pa.B. 3214 (May 24, 2014), hereby files this Petition to Intervene in the above-captioned consolidated proceedings.

**I. Introduction**

On March 21, 2014, Sunoco Pipeline LP (Sunoco) filed a Petition in the previously consolidated proceedings, including in relevant part, Docket No. P-2014-2411966, requesting a finding that: 1) Petitioner is a public utility corporation; and 2) the situation of Sunoco’s buildings to shelter pump stations and valve control stations in 31 Pennsylvania municipalities is reasonably necessary for the convenience and welfare of the public and therefore, that the buildings are exempt from any local zoning, subdivision and land development regulations (Petition).

On May 8, 2014, Sunoco filed an Amended Petition requesting, *inter alia*, a finding that a structure to shelter a pump station in West Goshen Township, Chester County is reasonably necessary for the convenience and welfare of the public and exempt from local zoning, subdivision and land development pursuant to Section 619 of the Pennsylvania Municipalities Planning Code, 53 P.S. § 10619 (Amended Petition).

Sunoco proposes as part of its pipeline project, Mariner East,<sup>1</sup> to construct a pump station at 1261 Boot Road, West Goshen Township (Boot Road Station)<sup>2</sup> to inject energy into the flow of ethane and propane moving through the pipeline. *See*, Exhibit C of Amended Petition. Sunoco avers that it will construct a structure to house the equipment associated with the Boot Road Pump Station.

**II. EGT's Interest and Standing to Intervene**

In support of this Petition to Intervene, EGT provides the following additional information:

1. The instant intervenor is the Board of Supervisors of East Goshen Township, Chester County, Pennsylvania. The Amended Petition has identified West Goshen Township as a location for the construction of one of the proposed pump stations to serve Mariner East; said location shares a contiguous border with East Goshen Township.

2. The intervenor's attorney in this proceeding is:

Margaret A. Morris, Esq.  
Reger Rizzo & Darnall LLP  
2929 Arch Street, 13<sup>th</sup> Floor  
Philadelphia, PA 19104  
(215) 495-6524 tel.  
(215) 495-6600 fax  
mmorris@regerlaw.com

3. Counsel for intervenor is authorized to accept service on behalf of EGT in this proceeding. EGT requests that the Commission and all parties of record serve copies of all documents (including but not limited to correspondence, discovery requests and answers, commission orders, pleadings and testimony) electronically on its counsel of record as well as by hard copy.

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<sup>1</sup>Mariner East project is an approximately 300-mile project that will make use of Sunoco's existing pipeline infrastructure, supplemented by construction of an additional 51-mile extension from Houston, Pennsylvania to Delmont Pennsylvania, to ship natural energy from the Marcellus Shale in Pennsylvania to the Marcus Hook refinery complex in Claymont Delaware.

<sup>2</sup>The property is a 4.42-acre parcel of property located entirely in West Goshen Township, Chester County, Pennsylvania; Tax Parcel 52-1-10.1, which is currently zoned as R-3 Residential.

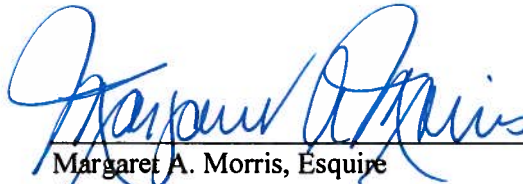
4. Sunoco is seeking to locate and to operate a public utility facility in West Goshen Township in an area currently zoned R-3 Residential. The interest of EGT and its citizenry will be directly affected by Sunoco's proposed construction at the Boot Road Station and no other participant can adequately represent those interests. Due to the early stage of the proceeding, EGT reserves the right to formalize its position after it has had the opportunity to evaluate Sunoco's further filings, conduct discovery and review any additional information that may be provided, and to raise and/or address additional issues that may be identified by other parties.

5. As a result of Sunoco's proposal to locate its facilities on property contiguous to East Goshen Township, EGT satisfies the standard for intervention pursuant to 52 Pa. Code § 5.72(b).

**III. Conclusion**

WHEREFORE, the Board of Supervisors of East Goshen Township respectfully requests that the Commission and the presiding Administrative Law Judges grant its Petition to Intervene and issue full-party status in the consolidated proceedings.

Respectfully submitted,



---

Margaret A. Morris, Esquire  
Attorney ID No. 75048  
REGER RIZZO & DARNALL LLP  
Cira Centre, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104  
(215) 495-6524 tel.  
(215) 495-6600 fax  
mmorris@regerlaw.com

Dated: June 9, 2014

Attorney for the Board of Supervisors of  
East Goshen Township

