

April 21, 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
Petition of Sunoco Pipeline LP
West Goshen Township - Petition to Intervene**

Dear Secretary Chiavetta:

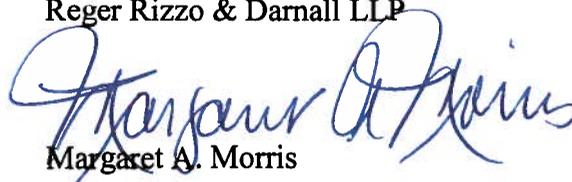
Attached for filing is the Petition to Intervene of West Goshen Township (West Goshen) in the above captioned proceedings.

As indicated on the attached Certificate of Service, a copy of West 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

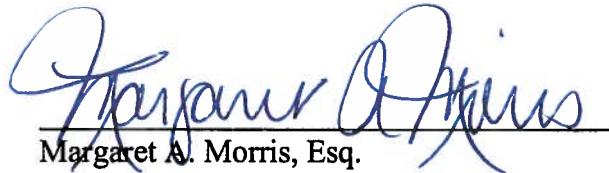
cc: Casey LaLonde, Manager, West Goshen Township [w/enc.]
Kristin S. Camp, Esquire, Buckley Brion McGuire & Morris LLP [w/enc.]

**Re: Docket No.: P-2014-2411966
Petition of Sunoco Pipeline LP
West 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: April 21, 2014


Margaret A. Morris, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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599 Lewisberry Road
New Cumberland, PA 17070

Date: April 21, 2014


Margaret A. Morris, Esq.
Attorney for West Goshen Township Board
of Supervisors

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Sunoco Pipeline LP for a Finding	:	Wallace Township, Chester County
For a Finding that the Situation of Structures	:	(Docket No. P-2014-2412411941),
To Shelter Pump Stations and Valve Control	:	Burrell Township, Indiana County
Is Reasonably Necessary for the Convenience	:	(Docket No. P. 2014-2411942),
Or Welfare of the Public	:	Lower Swatara Township, Dauphin County
	:	(Docket No. P-2014-2411943),
	:	East Wheatfield Township, Indiana County
	:	(Docket No. P-2014-2411944),
	:	Fairview Township, York County
	:	(Docket No. P-2014-2411945),
	:	North Middleton Township, Cumberland
	:	County (Docket No. P-2014-2411946)
	:	Frankstown Township, Blair County
	:	(Docket No. P-2014-2411948)
	:	Cambria Township, Cambria County
	:	(Docket No. P-2014-2411950)
	:	Derry Township, Westmoreland County
	:	(Docket No. P-2014-2411951)
	:	Loyalhanna Township, Westmoreland
	:	County (Docket No. P-2014-2411952)
	:	Penn Township, Westmoreland County
	:	(Docket No. P-2014-2411953)
	:	Hempfield Township, Westmoreland
	:	County (Docket No. P-2014-2411954)
	:	Rostraver Township, Westmoreland
	:	County (Docket No. P-2014-2411956)
	:	Allegheny Township, Blair County
	:	(Docket No. P-2014-2411957)
	:	Union Township, Washington County
	:	(Docket No. P-2014-2411958)
	:	North Strabane Township, Washington
	:	County (Docket No. P-2014-2411960)
	:	Penn Township, Huntingdon County
	:	(Docket No. P-2014-2411961)
	:	Chartiers Township, Washington County
	:	(Docket No. P-2014-2411963)
	:	Shirley Township, Huntingdon County
	:	(Docket No. P-2014-2411964)
	:	Upper Chichester Township, Delaware
	:	County (Docket No. P-2014-2411965)
	:	West Goshen Township, Chester County
	:	(Docket No. P-2014-2411966)
	:	Toboyne Township, Perry County
	:	(Docket No. P-2014-2411967)
	:	Upper Uwchlan Township, Chester County
	:	(Docket No. P-2014-2411968)
	:	Brecknock Township, Berks County
	:	(Docket No. P-2014-2411971)
	:	Spring Township, Berks County
	:	(Docket No. P-2014-2411972)
	:	Hampden Township, Cumberland County
	:	(Docket No. P-2014-2411974)

: West Cocalico Township, Lancaster County
: (Docket No. P-2014-2411975)
: Londonderry Township, Dauphin County
: (Docket No. P-2014-2411976)
: West Cornwall Township, Lebanon County
: (Docket No. P-2014-2411977)
: Lower Frankford Township, Cumberland
: County (Docket No. P-2014-2411979) and
: Salem Township, Westmoreland County
: (Docket No. P-2014-2411980)

**PETITION TO INTERVENE OF
THE BOARD OF SUPERVISORS OF WEST GOSHEN TOWNSHIP**

The Board of Supervisors of West Goshen Township (WGT), 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. 2145 (April 5, 2014), hereby files this Petition to Intervene in the above-captioned consolidated proceedings.

I. Introduction

On March 21, 2014, Sunoco Pipeline LP (Sunoco or Petitioner) filed a Petition at the above-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).

Sunoco proposes to develop its pipeline project, Mariner East, which involves the construction of a pump station and valve control station at 1261 Boot Road, West Goshen Township.¹ See, Exhibit A of Petition. Sunoco asserts that the purpose of Mariner East is to increase transportation infrastructure within the Commonwealth of Pennsylvania for the movement of Marcellus Shale resources and will utilize Sunoco's

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

existing pipeline infrastructure, in addition to the construction of the proposed pump and valve stations.²

II. WGT's Interest and Standing to Intervene

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

1. The instant intervenor is the Board of Supervisor of West Goshen Township, Chester County, Pennsylvania. The Petition has identified West Goshen Township as a location for the construction of one of the proposed pump stations to serve Mariner East.

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

Margaret A. Morris, Esq.
Reger Rizzo & Darnall LLP
2929 Arch Street, 13th 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 WGT in this proceeding. WGT 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.

4. Sunoco is seeking a special exception of the Municipalities Planning Code, 53 P.S. § 10619, to locate a public utility facility in WGT in an area currently zoned as residential. The interest of WGT and its citizenry will be directly affected by Sunoco's proposed construction of the pump station at 1261 Boot Road and no other

²Mariner East will originate in Houston, Pennsylvania and will terminate in Claymont, Delaware within the Marcus Hook refinery complex.

participant can adequately represent those interests. Due to the early stage of the proceeding, WGT 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.

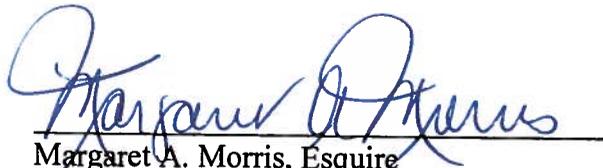
5. As a result of Sunoco's proposal to locate a pump station at 1261 Boot Road, entirely within West Goshen Township, WGT satisfies the standard for intervention pursuant to 52 Pa. Code § 5.72(b).

III. Conclusion

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

Respectfully submitted,

Dated: April 21, 2014



Margaret A. Morris, Esquire
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Attorney for the Board of Supervisors of
West Goshen Township

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

VERIFICATION

I, Casey LaLonde, Manager for West Goshen Township, hereby state that the facts in the foregoing document(s) are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.

Dated: April 21, 2014



Casey LaLonde
Manager
West Goshen Township