

April 21, 2014

Via Electronic Filing

Rosemary Chiavetta, Esquire
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
East Goshen Township's 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

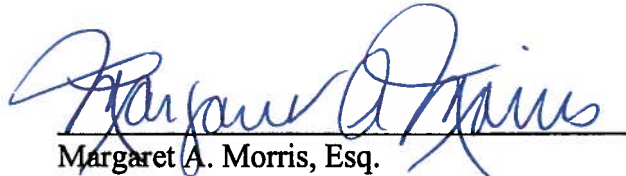
cc: Kristin S. Camp, Esquire, Buckley Brion McGuire & Morris LLP [w/enc.]
Louis F. Smith, Manager, East Goshen Township [w/enc.]

**Re: Docket No.: P-2014-2411966
Petition of Sunoco Pipeline LP
East Goshen Township's 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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Michael A. Powers
Fairview Township Planning Commission
599 Lewisberry Road
New Cumberland, PA 17070

Date: April 21, 2014



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

: 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 EAST GOSHEN TOWNSHIP**

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. 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, Chester County, Pennsylvania. *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 existing pipeline infrastructure, in addition to the construction of the proposed pump and valve stations.¹

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 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, 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 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.

4. Sunoco is seeking a special exception pursuant to the West Goshen Township Zoning Ordinance to locate a public utility facility in an area currently zoned as residential and contiguous to the border of East Goshen Township. The interest of EGT and its citizenry will be directly affected by Sunoco's proposed construction of the

¹Mariner East will originate in Houston, Pennsylvania and will terminate in Claymont, Delaware within the Marcus Hook refinery complex.

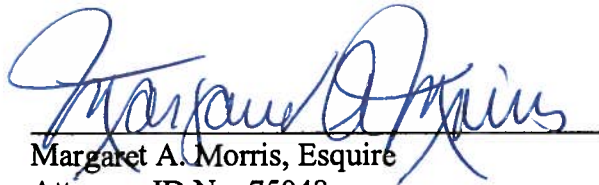
pump station at 1261 Boot Road and no other participant can adequately represent those interests. Due to the early stage of the proceeding, EGT reserves the right to formalize its position after it has had the opportunity to evaluate Sunoco's further filings, conduct discovery and review any additional 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 a pump station 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 Judge grant its Petition to Intervene and issue full-party status in the consolidate proceedings.

Respectfully submitted,



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

Dated: April 21, 2014

Petition of Sunoco Pipeline LP for a Finding
For a Finding that the Situation of Structures
To Shelter Pump Stations and Valve Control
Is Reasonably Necessary for the Convenience
Or Welfare of the Public


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:
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:
:

West Goshen Township, Chester County
(Docket No. P-2014-2411966)

VERIFICATION

I, Louis F. Smith, Jr. Manager for East 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 18, 2014



Louis F. Smith, Jr.
Manager
East Goshen Township