Horizontal Directional Drilling Requirements Subcommittee

5/19/2026

10:00am

Attendance: Kevin Campbell, Frank Riegler, Jason Broyles, Blake Ross, Sean Travis, Davy Myers, Michael Lambdin, James Mandera, Dave Coniglio, Mike Wartko, Kyle Ward, Chris Russ, Brian Holden, Garry Lee, Elizabeth Pyles, Brent St. Clair, Deborah Harris, Collin Crigger, Joel Johnson, Mike Lawson, Jim Wooten, Collins Cranmer, Lawrence Hampton, Matt Hines, Lori Wade, Shawn Hudgel, Leslie Schell, (Attendence list incomplete)

James Mandera opened the meeting at 10:01am

Had group review the meeting minutes from the previous meeting.

Motion made by James Mandera to accept the minutes

Seconded by Mike Wartko

Minutes passed unanimously

James Mandera- one ask of the group was around potholing issues, where we landed was not only are we asking to pothole to installation depth plus 12", but exposing pothole width as well. Just to make sure that we have that 360-degree clearance. I don't believe a.)b.)and c.) here has been changed. Are there any thoughts or discussions around b.1) or a.)b.)and c.), or is everyone comfortable here?

James Mandera- Hearing none, we are in a good place here, question in bold here, conversations at Enbridge, need to drill very deep, either going under a river or a swamp, or along those lines. Question for the group, these are the rules around HDD, right now, if you cross a facility you need to pothole to the depth of installation, what if the depth is 70' deep? Not sure how many folks have to drill that deep, but don't feel like it would be right to hold someone accountable if they are drilling that deep. Don't want to lose sight of that, but not sure where or how to address it.

Jason Broyles- Could be something that the CGA addressed, 10-11 new best practices around locating around any kind of water bodies. Can check to see what was discussed there to give us a starting point, do feel like it falls under this subcommittee.

James Mandera- Will throw it out to the group.

Jim Wooten- In a situation like that, would still request they spot the utility.

James Mandera- There may be an existing line running through an area and the utility that is being installed.

Jim Wooten- If the utility was 4', then you would spot that, and if you drill 50' deep, then you're good.

James Mandera- It says if you are installing something, that you have to pothole to the depth of new installation, which doesn't provide much value if you drill that deep.

Jim Wooten- It says they must spot the utility they are going to cross, to ensure the utility is marked correctly. Then if that utility is close in depth, then it is a conversation with that utility.

James Mandear- May need to chew on that and read through the current law.

Jim Wooten- we have a pipeline that is about 40' deep, anytime it gets crossed, we communicate that you do not have to see our line, we know it is that deep, and we will be on site to make sure everything goes alright.

James Mandera- Not sure that I want to change language for a one-off situation.

Mike Wartko- If you are going to do it, it may need to be an independent exemption.

James Mandera- Agree, may need to think about it more.

Brad Shoemaker- With the plus 12", EPA requirement with sewer and water crossing each other, it must be 18" apart. Could we change it to 18" from 12". This is an EPA requirement, national standard. Just dealing with water and sewer. EPA does not distinguish a difference between sanitary or storm sewer.

Shawn Hudgel- Just saying whatever water and sewer has to be separated by 18", I think it is different.

Brad Shoemaker- Agree, just wanted to discuss if we should bring them all in alignment.

James Mandera- I wouldn't have an issue, but maybe some of the excavators would?

Jason Broyles- Whenever we are trying to talk about that, that is a different subsection, that is something that if we have that conversation, we will need to take that back to the coalition and see if they feel there is a need.

Steve Thomas- concern I wanted to talk about/ask. Expertise around actual drill locating device/calibration. Concern I have is this language is meant to prevent a damage, and digging to the facility we are crossing, my caution is, if I don't see the drill head pass

through, how do I know it isn't just outside the 12", but could possibly bump or nick that line still. How do I know if I am safe if I don't see the drill head?

Shawn Hudgel- the box that monitors the drill is calibrated every day, if they don't see it in that hole, they dig to see their drill head to make sure they are clear.

Steve Thomas- I think that is a good point, I think we had language before saying if you don't see the drill head you stop and excavate. Can locate with pinpoint accuracy, but with electromagnetic locating, it's possible to be off, so could you still be off essentially with the location of the drill head? I agree that a responsible driller would do that, but would everyone do it?

James Mandera- Good conversation, the potholing requirements require to depth of new installation. If you go below a facility, if it is at 24", and you drill at 36", then you have to drill to 48" to be a foot below. We are going to have that 12" clearance.

Steve Thomas- Not so much the vertical stuff, and if it is deeper, then you're still good. More concerned with the horizontal location being accurate, and if it's not it could cause a damage.

James Mandera- Valid point, do we need to include some language around tracking of the head? If you are off 2 feet horizontally, before you get to that hole you would know. You would be tracking it for a while before you get to that pothole.

Steve Thomas- That is why I was asking the experts here, just correlating it to locating utilities and how that works.

Shawn Hudgel- My thing is, it is pretty accurate, once it is calibrated in the morning. I understand the concern, we need to caution ourselves before putting wording in for every single situation that can come up. We may be going down rabbit holes we don't need to. If we say we need to see the head of the drill in the hole, then we should be good. Caution ourselves to not go too far.

Blake Ross- Add a couple things to chew on, might be an easy fix, don't know 12" is big enough, if you pull a 12- or 24-inch reamer, it's bigger than your pothole, also seeing the head pass through could add some complications. If you are using fluid to slurry, as soon as it gets in that hole it's going to be full or water and mud unless they dewater that hole. Maybe some language could be put around size of the facility being put in. 24" main, size of proposed facility plus 12".

James Mandera- what we're talking about in 1 is depth of facility plus 12". Do we need to elaborate.

Mike Wartko- No matter what size the reamer would be, the 12” would be from the installation depth of the new utility.

James Mandera- that was the intent, but is this language getting us there?

Jim Wooten- If you pull a reamer, then the edge of that reamer has to be at least 12” away for the clearance.

Steve Thomas- to the installation of the depth of the new facility, new facility plus associated reamer? Does that clarify?

Jim Wooten- or we could say the nearest cutting edge?

James Mandera- Open to whatever, if you install a 12” facility, reamer would be around 18”, the calculation needs to incorporate that.

Shawn Hudgel- Instead of focusing the reamer or the head, have it be 12” from the size of your bore hole?

Steve Thomas- so to the depth of the new facility plus 12” in all directions from the bore hole?

Shawn Hudgel- 12” outside the diameter of the bore hole.

Dave Coniglio- Don’t have many members who do boring, have spoken with some of them, I feel like we are getting way into the weeds. Now telling contractors how to dig, it just seems like we are taking something in the ORC and what is proposed and now made it from a few lines to a few paragraphs.

Shawn Hudgel- I agree with you Dave, I feel what we currently have proposed is good, if we go further with it then we are doing exactly what Dave says. If we install a 24” casing, the 12” is to the outside edge of the casing.

James Mandera- I guess the conversation was going to the size of the reamer around that. Especially with larger pipes. Reamers could still be in danger of damaging the facility. At the end of the day, what is in the ORC currently, it addresses the 12” clearance.

Jason Broyles- There is a catch 22 currently, you can be closer than 12” if you have written authorization from that utility.

James Mandera- Lets chew on that, if you want to draft something up around that and send it out, we can look at it and think about it. I get the push back on not getting overly wordy, cause that can lead to confusion as well. Moving on to number 2, we talked about installation paralleling facilities. What we are trying to do is narrow down the area you are required to spot parallel facilities. Had discussed 10’ previously, this group thought it was

too much. We referenced the CGA best practices, theirs start at 5'. That's how we landed where we are today. If it is between 3-5 ft, then you pothole beginning and end, and every 100', and if you are inside 3' of an existing facility, you pothole every 50'. Do we want to put in all directions on the 12" clearance.

Jason Broyles- The wording around the 12" should match from each section.

James Mandera- Ok, then if we can make that change to make it match, 12" clearance in all directions so it is consistent. Are we comfortable with the 2 windows of 3-5, and inside 3 ft.

Jason Broyles- Shawn, Mike, who do drilling a lot, what is your average length of one section of drill pipe.

Shawn Hudgel- Just depends on what we are doing. With the smaller machines, could be 500ft,

Jason Broyles- Meaning how long is each drill pipe

Shawn Hudgel- Anywhere from 10-16 ft depending on the size of the machine.

Jason Broyles- Just want to make sure that we aren't making someone stop mid pipe.

Mike Wartko- We could go several hundred feet but would pothole before we made the drill shot.

Shawn Hudgel- Agree, our company policy is stricter than what this language is. But leave it up to the excavator if they want to be stricter. I think this is fair.

James Mandera- Yes, this would be the minimum but can be stricter if you want. Does this cause heartburn for anyone on the call?

Steve Thomas- I think that this is extremely cautious, I am confused why I am required to pothole if I am 3-5 ft away from the marks? Unless I am in the tolerance zone, why am I required to pothole that?

Jason Broyles- It states currently, inside the tolerance zone, every 100' it has to be spotted, if outside, you still have to spot utilities outside the tolerance zone regardless of how far away you are from that utility. So how can we get when we are drilling, to not have to spot utilities that are that far away.

Steve Thomas- I think this brings more clarity around that. For damage prevention this is great, just as an excavator, it brings up questions. But I am good with it.

Dave Coniglio- How often is it happening that they pothole a line 100' away?

Shawn Hudgel- It can be regular, depending on the area you are working in. If we run parallel, we spot every 20' as we are coming through. It may be marked in a straight line, but it doesn't always mean it is a straight line.

Jason Broyles- I think he means, day to day, gas line marked 100' away from that proposed drill line, as you having your crews spot that line to the install depth.

Shawn Hudgel- If that is what he is referencing, then no.

Dave Coniglio- Glad you explained and that makes sense. I don't know if it is something that is not happening now?

Jason Broyles- Keep this in mind, stuff that happens in the industry already. It isn't happening very often now, common practice is if they are further away they aren't spotting, but we want to put language in here to make that course of action legislatively acceptable.

Mike Wartko- If we aren't doing it, and it doesn't make sense to do it, then let's put language to make it legal.

Rod Troxwell- From the utility side, company boring 3-5 feet from the allowable zone, they got into out main line secondary feed, twisted it around their head. Blew a fuse, no injury. Could have been a primary which would have been worse. I think the 3-5 ft should be fine, we just don't want anyone hitting anything and getting hurt.

James Mandera- Agree, definitely a safety factor. Any other thoughts on this?

James Mandera- Ok, if we could scroll down and discuss the definition of nondestructive. We have talked about it before and what the intent was. Intended for air and hydro vac equipment, and hand tools. But it has been interpreted that nondestructive means we can't tear up the road. This is where we are with the recommended change. "Pertains to existing utilities and doesn't pertain to hard surfaces or roadways" Last meeting there were examples of driveways and sidewalks that they wanted included in here. Does this make sense to everyone on the call? Hearing none, I think we are good. Obviously, we still need to address the deeper bore portion, but the rest we seem to be pretty close on. Thank you everyone. Going to the gravity sewer discussion, I think we are all familiar with what the intent is. Talking points from last meeting, discussion around asking permission to open manholes, that is addressed in b.). also, some discussion on providing exemption on gravity sewer lids and someone pulling a communication manhole vault. Question for the group, because of contacting the owner, operator ahead of time.

Rod Troxwell- Are you talking about storm sewer or sanitary sewer.

Jason Broyles- Both

Rod Troxwell- with storm sewer, there is nothing that will happen if you pop a storm sewer lid, but sanitary could have trapped gases and some hazards on that end.

James Mandera- So you are saying the gravity sewer manhole doesn't cover both?

Rod Troxwell- I guess with this wording it would.

James Mandera- Asking permission would require contacting the owner operator to get permission due to things that could happen if the lid isn't put back on correctly.

Dave Coniglio- Just to expand, those are considered confined spaces, and under OSHA regulations, you can't legally enter anyway with permission or not unless you follow the OSHA rules and regs for confined space entry.

James Mandera- Fair point, where the assumption was made here is that no one would be entering. Maybe we need to add language to point that out. Not wanting someone to jump down in there, the assumption was to get the measurement from above.

Dave Coniglio- Not suggesting we add to it, the contractor should know what the regulations are per 1910. (4 or 6 something) are the regulations that govern that. Can't enter unless you follow that.

James Mandera- What if we put, "shall not enter"

Jason Broyles- I don't think that would be necessary since it is already spelled out in OSHA law.

James Mandera- Fair enough.

Brad Shoemaker- To Daves point, maybe if we just reference the OSHA code, as a sewer operator, there could be gases expelled that could overcome someone who is standing above.

Joel Johnson- We have had that happen in the city of Columbus, the employee who opened the lid ended up fainting. Luckily a co-worker was there and followed emergency protocols. It is a concern with popping those lids, people not being properly trained, you don't know what you are getting into.

Shawn Hudgel- I agree with that, I think we need to add language. Contact for permission to remove lids, and follow 1910.146, I think that needs to be put in there that they have to follow that. When I read this, I think of getting permission to remove the lid, but on the safety side we need to make sure all safety precautions are taken.

James Mandera- Good conversations, I am worried about citing a specific code, are there others that are being missed? Should just say to follow all applicable OSHA regulations.

Dave Coniglio- You could say pursuant to all federal, local, and state regulations. The gases in those confined spaces can be deadly. There could be some other things with PPE. All applicable OSHA, Federal, State, and local regulations.

James Mandera- My knee jerk is that it is all assumed, but maybe they aren't trained in it because they haven't dealt with it before.

Jake Wright- Great Lakes Construction- question, this is proposed language I am reading right now? Why do we want to put something in about the OSHA code or regulations? Does it protect one party in particular?

Jason Broyles- For people who may not be as fluently trained, we are giving them a reference point, so if they aren't familiar, they know where to look for the regulations for safety reasons.

Jake Wright- Ok, I think putting something in there, to James's point, more general and make sure you follow OSHA regs when entering.

Brad Shoemaker- Maybe a simpler way is to require a permit from the utility owner, then it could be dealt with on the permit process and make them away of the safety requirements.

Jake Wright- One other thing, for notifying the operator/owner for permission before removing the lid, other than the safety hazards, is there a reason that is being asked to be done?

Jason Broyles- The reason that was added in, there are manhole lids labeled as sewer that aren't sewer, consider situations where you are accessing a utility vault that you don't own. No different than if I wanted to go open fiber vaults, or tapping into gas lines. They need to be aware you are messing with their utility. Some places even have locks. Doing gas lines, we had to camera all sewers pre and post install. Had to talk to the municipalities and go through the permitting process, and the permit gave us the legal access to that sewer.

Shawn Hudgel- You are correct, we have to get permits to access all that.

James Mandera- I think this goes back to Brad's comment of addressing that during the permitting process. Is that the case for every sewer utility? Some may ask for a permit, others may not and it's just a conversation. Wanted to leave this at a higher level if that makes sense. Are we happy with what we have here and have the OSHA references or do the permitting process.

Joel Johnson- I disagree with allowing popping manhole lids for depth measurements.

Dave Coniglio- This is as it relates to directional drilling

Joel Johnson- I just think that getting depth for sewer popping manholes, if it is within 50' of a manhole lid, or 100' away, the depth can change drastically.

James Mandera- That's why we also addressed using the upstream and downstream and taking the shallower of the two.

Joel Johnson- Yes, but it just doesn't sit well with me on how we have our sewers.

Jason Broyles- Not a hang up, we want to make sure we are looking at every aspect to make sure we make the best decision.

Joel Johnson- I get it but talking earlier of potholing to the depth of install, I feel like this muddies that.

James Mandera- I can see how that can seem like it does, part of the benefit is we aren't busting all the roads up either and we should take that into consideration. If we know we will have a large clearance, why bust the road up.

James Mandera- We will chew on b.) and look at adding language to alleviate the concern over confined space. Getting to our clearances, calculating the distances, if you are installing something deeper, then you need to take the deeper measurement. We adjusted the minimum vertical separation of 5' either above or below.

Steve Thomas- Yes, this does cover what I was discussing the last meeting.

James Mandera- Method restriction, we are talking about HDD installation with steering abilities. Not moles or missiles. Do we need to add HDD with steering capabilities to the definitions? It needs to have the steering capability.

Jason Broyles- I don't think we do, I think number 3 spells it out, but that is a discussion for the group to have.

James Mandera- Any issues with #3? Hearing none, we will move on. If the 5' clearance cannot be maintained, you can still have this exemption with at least 3' clearance, and a CCTV inspection to make sure the sewer line was not negatively impacted. Any thoughts or concerns with that?

Rod Troxwell- In Cuyahoga Falls, we do require that.

James Mandera-Does this exemption as a whole cause any issues.

Rod Troxwell- getting with the utility owner, they will get the permit, so that takes care of it on our end.

Mike Wartko- Contractors will have to realize there is this law, but each municipality has their own regs before breaking ground.

Dave Coniglio- On the CCTV thing, is that being done before and after? This just says to be done afterwards. I could see where there could be a dispute of if that crack was previously existing. If you don't do a pre inspection, then how do you prove you didn't or did cause the issue. Not saying you have to, but something to think about.

Shawn Hudgel- I agree, that is part of our cross-bore program, we do a before and after inspection to ensure that we did not damage that facility.

Dave Coniglio- Being done before and after, it's up to that organization and their policy. To put it in the regs, if it isn't done before, then it leaves room for issues.

Rod Troxwell- Our permits call for pre-and-post inspection.

James Mandera- All the gas work we do at Enbridge, most of our CCTV is for the laterals, not the mains, but as a best practice, it is a good thing to do. I think that is more of an individual practice. This would be the minimum, each excavator can be stricter if they want.

Dave Coniglio- I'll leave it open to the group, but I would say to remove the mandate that is done at the end, if it isn't done before then it's a mut point.

James Mandera- Its to ensure no damage

Dave Coniglio- If there is a damage, something is going to happen, and it is going to be handled with that particular excavator. Potentially mandating problems/arguments if it only done on the back end.

James Mandera- The thing to keep in mind also is you don't have to use this exemption and can pothole and be done with it. But if you do use this exemption. This would be the minimum.

Micheal Evans- Are you all seeing this type of issue on the county areas, or in the municipal areas?

Jason Broyles- More so on the municipal but could be an issue on the county roads as well.

Michael Evans- When we are working on this tuff, could be a speed bump by not keeping it greyer. Having it be more fluid may make it easier to get through. If there is a way to have it be looked at as guidance, instead of a shall, anytime you hear mandated it raises red flags. It may be more favorable that way.

Jason Broyles- If we add in at the top of all this spelling out that this is optional, the excavator can still spot the utility, or go this route, would it help? I assume people know they have 2 options and can pick.

Michael Evans- I think what would be beneficial, 2 scenarios, “when/then”, treating it like that and can walk through it mentally, then they can decide. Could struggle in the local government realm, it’s hard for them to maintain on permitting. Firth option, then if that can’t work then you have this option. And that I would write it more general.

James Mandera- Hearing all that, is that part of the problem is the ORC, there is a lot of grey area and gets misinterpreted. In these conversations I try to eliminate the grey. To yours and Jason’s point, you don’t have to do this, but if you do, these are the rules.

Michael Evans- Working on something similar on another bill at the statehouse. The reason it is written in grey is that it can be fluid on case-by-case scenarios. To be able to get around some things and get agreement. There are many ways that other folks do things and leaves room for them to do things.

James Mandera- That is great input, and we are at a point now we can combine these documents and start drafting some stuff to pretty it up. Next steps, me, mike, and Jason and huddle up and get those documents combined. Thank you for everyone’s time and thoughts. We will clean this up and get this put to everyone and schedule another call.

Meeting adjourned at 11:32am