

Horizontal Directional Drilling Requirements Subcommittee

8/18/2026

10:00am

Attendance:

Jim Mandera opened the meeting at 10:02am

Have a lot of municipalities currently coming up with their own language on this topic during their permit process.

Black text is existing in the ORC, red is what has been added during previous meetings, and green is from our last meeting.

Reviewed proposed language regarding the definition of non-destructive manner. Intent is that it does not pertain to having to cut or remove roadway.

Reviewed proposed HDD responsibilities of an excavator. Note that we need to eliminate confusion of not having to “daylight” existing facilities. If a facility is marked, and its not being found when potholing. When you cross something, you do need to pothole the width of the tolerance zone to the depth of new installation.

Some confusion with that language, excavators feel like they have to go all the way down and visually verify the utility location, regardless of the depth, and not stopping at the depth of their install. Intent it to go down to installation depth, plus 12” to ensure proper clearance. Want to make sure we make that clear in the proposed language.

Existing language already says to the new installation depth.

Some people go further, or above and beyond just to make sure that they do not hit anything.

Any suggestions on how to tweak this language to make sure it is clear.

Current language is already clear in the law.

If a contractor wants to go above and beyond that is great, but the ORC needs to outline the minimum. Not all utilities are always marked spot on, but not sure we can craft language to make an excavator go above and beyond, but open to suggestions from the group.

Could add some language stating expose and confirm any potential underground utility facilities.

Would need a definition of potential existence. Could be read both ways, so could still be confusing without a definition. What is potential existence?

Regarding 12" in all directions, is that depth, horizontally. Could be confusing for someone that is not as familiar with the law. Most understand it now as going 12" deeper.

With each crossing point, if you are at a crossing point, then there would be an existing utility, which makes it a crossing point.

If you install something at 24", and cross something that is 6' deep, then it needs to be clear that you don't necessarily mean you have to visually see the line that is 6' deep. Just down to 36" to cover depth of new install, plus 12" clearance.

Was brought up that the 12" applies in all directions, not just depth. Want to make sure we make that clear.

Excavator shall ensure excavation equipment is calibrated to manufacturer specifications, and someone has to monitor the pothole to ensure no damage. Had a lot of discussion with that.

Some conversation whether we needed to add reamer to that statement. Drill head and/or reamer. Some contractors forget about the reamer being wider than the drill head, and cause damages on the pull back.

Adding "reamer" should fix that and give clarity.

Technology is changing all the time, just say, any drilling equipment is monitored as it enters and exits. That way as technology progresses, it covers that.

Could we just say "cutting edge" instead? That would cover all equipment.

That should address equipment changes.

If we just put in the equipment, that covers anything that enters or exits that hole.

Does that mean someone would have to stand there even while the rod is being pulled back. The rod is not a cutting edge, and that could cause confusion.

Can a rod come apart and break in a hole and cause a damage?

Need to be careful, depending on the length of the drill, and how many crossings there are, monitoring the rod would not be realistic, and that is not the intent here. One person should

be able to watch each hole as the drill goes through and is pulled back. Cutting edge would eliminate having to watch the rod in the hole.

Intent is not to have someone watching a rod after the cutting edge has already passed.

Believe the majority of other states are using cutting edge as well.

Believe that gets us where we wanted to be.

Aren't we pretty much covered when saying entering and exiting the pothole.

Is what is written clear based on what our intent is?

As long as this group agrees that cutting edge refers to the reamer as well, then I think we are good.

The reamer is cutting when it comes back, the reamer is bigger than the drill head, so it would be a cutting edge.

Agreement, but want to make sure the every day person knows that is what we are talking about.

Maybe we could give an example to clarify it

What if we said both directions?

Think entering and exiting was good enough itself, can't solve every single possibility of confusion.

Could clarification be provided during rule making. The broad direction in the ORC, then give clarification and examples.

Could be more specific in the administrative rule making rather than the ORC. If there is confusion, instead of technical terms in the ORC, then you put it in the OAC during rulemaking. Think it is broad enough now, and to give more specifics could be done in the OAC. Not everything has to be in the revised code, and probably shouldn't given the technology advancing quickly.

Valid point, doesn't all need to be in the ORC, it can be done from an education perspective as well.

Can we put cutting edge in the definitions?

Yes.

Note that C was removed, the group had heartburn with it, and just wanted to clarify that it was removed (Direct communication with the operator and spotter while drilling)

Is that what the group wants, or should we put it back in?

Will leave it crossed out, will leave that process up to the individual excavator. Not sure how they can alert someone to a potential damage, think it is important, but will default to what the group wants.

Reviewed proposed language of parallel facilities.

3-5 ft of the outer limits of the tolerance zone- expose every 100'

Within 3ft of the outer edge of the tolerance zone- expose every 50'

The outer limits of the tolerance zone can leave room for error, some are leaning to outer edge of the existing utility, need to decide what language to use.

If we visually observe the utility, then I think outer edge of utility is fine.

If a 40" water line is located, going off of the utility, then that may not work unless that utility is visually seen. Think that outer edge of the observed utility is good and can measure from there.

If we go with outer edge of the observed utility, does that bring the question of a line being put in at 24", and the parallel line is 60" deep, will you have to visually expose it to be able to get your footages to know how often to spot it?

That is a great point.

With a parallel, you dig at the beginning and end, the area in between that utility can take a bend. Think that the outer limits of the tolerance zone is better because you can see the mark above ground.

Also, "exposing" may need to be revised too, considering you could be parallel to a gravity sewer line that is 20' deep, and if you are running 24", that would not make sense.

Think we should still be digging to the depth of the new install, plus 12". Need to try to make the language a little bit more straightforward.

3-5' plus the width of the existing.

(Chat) 3-5 feet from the markings, plus the width of the utility if known, expose every 100 feet.

Hung up on expose, do we need to require them to expose, or just ensure that there is nothing there? If you are running parallel to a line that is 8' deep, and only running 24", I don't think that is the intent.

Pothole to confirm and expose any potential underground utility facility every 100'.

There is a difference between potholing and daylighting. And we can clarify that in the definitions if need be.

Pothole to expose and confirm any potential

Think pothole is the right term, that is just going down to a certain depth, but daylighting is actually uncovering the facility.

The intent isn't to have an excavator pothole 10' deep

Think we should keep it consistent in number 1 as well.

Will need to verify the definition of pothole, need to make sure that point isn't lost.

What if you are within a foot?

By law, you can't be within a foot.

What if you are within 15"?

Only thing we can point to is that there has to be a 12" separation. Does this group want to say you can't install anything within 18"?

Without written permission from that utility.

That would need to be something to take back to the coalition co-chairs and have a new subcommittee formed to discuss that.

Shouldn't be drilling within the tolerance zone, if it has to be that close it should be open cut.

If you drill within 12" of your own facility, that is different, it is a replacement. Someone else doing it is pretty tight.

Plus 12" in number two should read plus 12" in all directions as in number 1.

Between potholing and daylighting, understood potholing was digging down to the top of the facility, and daylighting was exposing the entire facility.

That is where the definition will clarify that.

Looking to avoid saying it has to be daylighted. Won't require you to daylight a line that is 6' below your drilling.

Discussion from the group around the definition of a pothole, it is important that we define the definition in the ORC of what potholing is.

Discussion of proposed language in number 3, ensuring proper clearance from existing utilities.

Settled on 12" originally due to how congested the utility right of ways are, and keeping 18" of separation isn't realistic with how crowded things are.

That is why potholing every 50 feet is important to make sure those utilities are running the way they should.

Can we do a quick straw poll to get a feel to see where we are at. Is everyone comfortable getting this language cleaned up and distributed to see if we have agreement on that language that we have discussed so far? That way we can get this put together as a rough draft and then discuss the sewer exemptions as a separate topic. Will still leave red and black (red-proposed, black-existing). That way everyone can take that back to get feedback, and then on the call next month we can start moving forward with that part of it.

A little hesitant to break this up, C is an exemption you can use if you choose to do so.

Not saying to move forward as two separate pieces, just want to get a semi-finished version of the language that we have so far. That way we can focus on C moving forward since we would be in agreement with the language so far.

No opposition to that.

Having a clean document showing where we left things would be a good practice so we can discuss and show where we are. Will help the conversation moving forward. Want to be looking at the most recent document.

Discussion of the exemption on not having to pothole gravity sewer mains.

Depth verification, using manholes upstream and downstream.

Must obtain written permission of that utility owner prior to opening manhole lids to get depth. Permission can be written, email, permit, etc.

This only applies to gravity sewer manhole lids, and not any other sewer appurtenances.

Thoughts from the group?

Are manhole lids clearly identified to tell what is gravity and a forced line, or a lateral service line lid.

Force mains don't typically have manholes, usually have more of a valve box. Force mains are different types of connections.

5' minimum vertical separation between new install and existing gravity sewer. When going under, its top of new facility to bottom of gravity sewer main line, when going over top, bottom of new facility to top of gravity sewer. If depths are different, the closest measurement to the install shall be used. Have to make sure to maintain the minimum separation.

This exemption does not apply when the install method is bullets, jacking, and a non-steerable drilling method.

Does not apply to all trenchless technologies, just active, steerable drill heads.

If you can't maintain a minimum 5' clearance, then it can still apply if you have at least 3' separation, provided the CCTV the line, verify the line has not been damaged/impacted due to the drilling, documentation maintained by the excavator, and provided to the owner upon request.

If you don't want to use the exemption, then you would pothole the facility.

Reviewed proposed definition of what HDD means.

Will get clarity from LSC if we need to where we would need to add this definition.

Question with the manhole lids. What was the intent there with getting the written permission to pop the lids?

Intent was to get the depth measurement to know how deep that gravity sewer main line is running. Some operators didn't want everyone out there popping lids, so asked that permission needs to be granted.

Do have some low lying areas near the lake fronts, and have some shallow pipe, contractor knew the sewer line is there, and due to the system being a high flow, those manhole lids are bolted down. If the threads are messed up if its not done correctly, those lids can blow off during high flow times. Something to think about, and the written permission is good. Everyone needs to make sure that they know who to contact, and how do they contact to get that written permission.

Intent was to get the written permission, and it is up to the excavator to figure that out. Most are already working through the permitting process and can be taken care of there. Its going to be up to the excavator, and if they can't get it, then they have to pothole.

There is nothing in here that mandates that the utility has to give that permission. The owner of that facility can decide to not give permission. The excavator has the option to use this, and the utility has the option to allow or not allow.

The permissions needed to enter sanitary manholes, dipping manholes to get depths, most departments will give you a verbal, to get CCTV, then you will generally need to get written permission. Usually, will want a bond to recoup if there is damage from a camera getting stuck, and to know who is in there. To do a survey to identify depth and locations, you may not need written permission, you may just need a verbal.

In past meetings, it was said that written permission is needed.

Even though the risk to the line is minimal, it was more about the collar for the sewer lid, or something happening during removal and reinstalling the lid. Or if a lid isn't seated correctly and it damages a car.

Written has been a sticking point, if it is just for depth, then you can do it and get your depth. Written permission can take some time and think verbal would be ok to get it timely.

Contractors tend to agree that verbal would be ok.

A simple email after a phone call can serve as the written permission. Also need to be aware of gasses that can overtake you on the ground as well when you open that manhole.

Think we need to keep it as is because of all of these reasons. If you have trouble getting that exemption, then you will just have to pothole the line. From a planned work perspective, this has some value to keep from needlessly breaking up the road. There will be times when you will have to pothole it.

Written permission will avoid issues in the future. Owners won't have to try and figure out who is popping their lids. They are not the contractors to pop, they belong to the utility owner, and there needs to be accountability.

To be clear, written permission is how it is going to be. Some say that verbal would be ok, but could it be something to get other forms of communication other than just written.

If someone verbally says it is ok, they can follow up with an email to provide written permission.

What if we use documented permission instead of written permission. Could write down the conversation. This exemption now only applies if you get written permission, but in the field today, people are getting verbal permission as well.

That was requested by the gravity sewer mainline operators.

Are sewer operators comfortable with documented permission instead of written permission. The operator of record can give permission, but a field person in maintenance

may not have the authority to give that permission. So needs to be documented that it is given, and from whom.

If this proceeds without a written or documented permission being required, sewer operators may not be ok with that and it may come back to us and have to restart from step 1.

Majority seem to be ok with documented, and the word written is the sticking point. Does documented permission work better for everyone?

Rules need to be followed, the bad players and the bad players. Good players will feel like they are slowed down having to obtain permission. Getting that documentation is going to protect you.

Documented makes it so it can be text, email, and many different ways it can be documented.

It's going to come down to being covered. It will be up to the contractor to do what is best and then go from there.

All of these changes from every subcommittee is to help make things as clear as possible.

Think this can all be put out once it gets cleaned up for review from the group. Once it is cleaned up, it will be distributed to the subcommittee for review.

James Manderla adjourned the meeting at 11:32am.