



BUCKEYE PARTNERS, L.P.

RECEIVED FEB 26 2013

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February 25, 2013

Mr. Byron Coy
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2013-5003 Buckeye Partners, L.P. – Auburn, NY Inspection
Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order

Dear Mr. Coy:

Buckeye Partners, L.P. (Buckeye) has reviewed the referenced Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (NOPV) received on January 28, 2013 from the Pipeline and Hazardous Materials Safety Administration (PHMSA) relating to the August 2011 inspection of Buckeye's pipeline facilities in Auburn, NY.

Buckeye does not contest the probable violations in the NOPV, and provides additional information regarding each item. Regarding Item 1, the New York State Department of Public Service inspector noted that the location of the buried pipeline at the railroad crossings shown on the Buckeye map and as stated by Buckeye personnel differed by over 1,000 feet. Buckeye personnel participating in the inspection were not the personnel normally assigned to the area and incorrectly described the location of the pipeline. The Buckeye maps were later checked and found to accurately depict the location of the buried pipeline. Subsequent to the inspection, the appropriate amounts of pipeline markers were installed.

Concerning Item 2, at the time of the Auburn pipeline facilities inspection, Buckeye was in the process of completing its plan for checking all of its line markers system wide as part of the Compliance Order made part of PHMSA's Final Order CPF 3-2007-5026 issued to Buckeye on December 10, 2010. Buckeye's completed its plan and checked all line markers by December 31, 2011.

In reference to Item 3, Buckeye has cleared the pipeline right-of-way and installed additional pipeline markers between Buckley Rd. and Morgan Rd. so that the right-of-way inspection requirements of §195.412(a) can be better met. Buckeye believes that it has complied with the conditions of Item 3 in the Proposed Compliance Order and requests that it be removed.

February 25, 2013

Buckeye has initiated its process for paying the proposed civil penalty amount. If you have any questions, or need additional information, please feel free to contact myself or John Reinbold, Manager, Compliance at 610-904-4185.

Sincerely,

A handwritten signature in blue ink that reads "Thomas S. Collier". The signature is written in a cursive style with a large initial 'T'.

Thomas S. (Scott) Collier
Vice President, Performance Assurance & Asset Integrity
Buckeye Partners, L.P.

cc: C.A. Ostach
J.J. Mattis
J.B. Reinbold