



## BUCKEYE PARTNERS, L.P.

---

Thomas S. (Scott) Collier  
Vice President, Performance Assurance and Asset Integrity  
(610) 904-4922  
E-Mail: tcollier@buckeye.com

Five TEK Park  
9999 Hamilton Blvd.  
Breinigsville, PA 18031  
Fax (610) 904-4645

December 17, 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 1-2013-5026 Buckeye Partners, L.P. – Portland, ME Inspection  
Notice of Probable Violation and Proposed Compliance Order

Dear Mr. Coy:

Buckeye Partners, L.P. (Buckeye) has reviewed the referenced Notice of Probable Violation and Proposed Compliance Order (NOPV) received from the Pipeline and Hazardous Materials Safety Administration (PHMSA) on November 20, 2013 relating to the July/August 2012 inspection of Buckeye's pipeline facilities in Portland, Maine. Buckeye's response to the following probable violations listed in the NOPV is provided.

1. §195.575 (c) You must inspect and electrically test each electrical isolation to assure the isolation is adequate.

Buckeye did not demonstrate through inspection and electrical tests, that electrical isolation is adequate. During the inspection, the PHMSA inspector noted that at the railroad crossing near Kennebec Road, on the Bangor and Aroostock Railroad at engineering station 6236+ 14, there were no test leads installed on either side of the railroad. Buckeye personnel stated that they had just started a project to install additional test leads. Buckeye personnel also stated at the time of the inspection that there were 97 cased crossings without test leads installed. Therefore Buckeye failed to inspect and electrically test each electrical isolation to assure the isolation is adequate.

**Response:**

When Buckeye acquired this pipeline in 2011, the pipeline had a selected few test stations installed. To ensure the adequacy of cathodic protection on this pipeline, Buckeye in early 2012 reviewed historical records and performed field testing to determine which casings never had test leads installed. Buckeye developed a test station installation plan immediately after this review and began implementing the plan in 2012 and has continued installation in 2013. The existence of this plan was acknowledged in PHMSA's NOPV. To date 38 test stations have been installed.

The remaining locations requiring test leads have been prioritized for 2014 and 2015 based on high consequence areas, relative risk scores (from the 2012 risk analysis), and carrier pipe metal loss detected during the 2012 in-line inspection. A close-interval cathodic protection survey was performed in 2013. This data is still under review and the results may lead to a re-prioritization of the remaining installations.

Buckeye believes that it has responded in a reasonable manner to correct the lack of monitoring facilities on this pipeline system. However, per the Proposed Compliance Order, Buckeye will complete all of the casing test station installations and evaluate the electrical isolation of the casings within 600 days of the date of receipt of PHMSA's Final Order.

With regard to Issues 2 and 3 in the NOPV that have been determined to be Warning Items, Buckeye will take the necessary actions to ensure that in the future the cathodic protection electrical testing will take place on this pipeline within the required intervals and that it will properly record the serial number of the survey reference electrode as called out in its procedure.

If you have any questions, or need additional information, please feel free to contact myself or Claudia Pankowski, Director, Regulatory Compliance at 610-904-4113.

Sincerely,



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

cc: C. Ostach  
J. Mattis  
C. Pankowski  
M. Shook