



BUCKEYE PARTNERS, L.P.

Celebrating 125 Years of Service
1886-2011

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May 17, 2011

VIA UPS NEXT DAY AIR

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

RE: CPF 1-2011-5002 - Notice of Probable Violation, Proposed Civil Penalty
Duncansville Unit from Sinking Spring to Duncansville, PA

Dear Mr. Coy:

Buckeye Partners, L.P. (Buckeye) received the referenced "Notice of Probable Violation and Proposed Civil Penalty" (Notice) on April 19, 2011 concerning the 2010 inspection by the Pipeline and Hazardous Materials Safety Administration (PHMSA) of Buckeye's Duncansville, PA facilities. The following are Buckeye's responses to each of the items listed in your letter.

1. Buckeye failed to inspect and test two (2) High Pressure Switches at the Duncansville Station at intervals not exceeding 15 months, but at least once each calendar year.

Buckeye acknowledges that it did not inspect High Pressure switches in question in calendar year 2008 however it wishes to emphasize the fact that the inspections were completed within the 15 month maximum interval. The inspections performed on 2/3/09 found the high pressure switches to be in good condition with no unsafe conditions. Following the inspection, all necessary personnel at Duncansville have been re-educated regarding the calendar year portion of this regulation.

2. Buckeye failed to inspect four mainline valves at intervals not exceeding 7½ months, but at least twice each calendar year.

Buckeye agrees that the inspection of the valves in question exceeded the 7½ month maximum inspection interval. In each case, the latter inspections revealed that there were no unsafe conditions and the valves were in proper working order. The necessary personnel have been re-educated as to the inspection requirements for mainline valves.

May 17, 2011

Buckeye takes very seriously the issues that were raised during this inspection and has taken the necessary steps to re-educate its personnel involved. In addition, Buckeye has initiated DOT Part 195 regulatory re-training efforts across its operations to address compliance requirements. Buckeye will be sending payment of the proposed penalty by wire transfer in accordance with the requirements of this Notice. If you have any questions or need additional information, please feel free to contact myself or Mr. Scott Collier at 610-904-4922 or by e-mail at tcollier@buckeye.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeremiah J. Ashcroft', with a stylized flourish at the end.

Jeremiah J. Ashcroft
Vice President, Field Operations

cc: T. S. Collier
J. R. Reinbold
C. Ostach