



BUCKEYE PARTNERS, L.P.

RECEIVED APR 13 2017

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April 12, 2017

Mr. Robert Burrough
Acting 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 1-2017-5008M Notice of Amendment

Dear Mr. Burrough:

Buckeye Partners L.P. (Buckeye) received the referenced Notice of Amendment (NOA) on March 17, 2017 relating to the 2016 system inspection procedure review that took place from July 12, 2016 to July 14, 2016. Buckeye does not contest the notice and has either filed revised procedure changes under other PHMSA CPF actions that address this NOA or will file amended procedures all as indicated below.

Finding #1:

In responding to PHMSA's CPF 1-2014-5007, Buckeye met with a PHMSA representative on August 25, 2016 in Linden, New Jersey and discussed changes to Buckeye's Procedure F-37 which included this finding. The revised F-37, DOT-Mandated Aboveground Tank Inspections and Repairs Procedure (See Attachment 1) was submitted to PHMSA on October 28, 2016 and again on March 30, 2017. The revised procedure does not include the sentence "and therefore are not jurisdictional until placed back in-service". Buckeye respectfully requests the closure of this finding.

Finding #2:

Although Buckeye does track revision history for its procedures which allows the determination of original publication date, Buckeye does not include original publication date on these documents as this information is not material for the execution of the current approved procedure.

To address this finding Buckeye has the effective date to the procedures included in the Corrosion Manual. Attachments 2 and 3 are provided for the Corrosion Manual Atmospheric Corrosion Procedure and Corrosion Control Manual Appendix F-1 respectively.

Buckeye will be submitting a revised 195 O&M Manual F-28, Security Fences.

Finding #3:

Buckeye will be submitting a revised 195 O&M Manual F-28, Security Fences.

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Finding #4:

As a point of clarification, Buckeye utilizes an Enterprise Asset Management (EAM) system called JD Edwards Enterprise One. The terms EAM and JD Edwards Enterprise One are used interchangeably and are recognized by users of this specific procedure. For additional clarity, Buckeye will revise this procedure.

Finding #5:

Buckeye will be submitting a revised 195 O&M Manual F-28, Security Fences.

If you have any questions, or need additional information, please feel free to contact myself or Claudia Pankowski, Director, Regulatory Compliance at 610-904-4185.

Sincerely,



Thomas S. (Scott) Collier

cc: C. Ostach
C. Pankowski