

RECEIVED FEB 18 2020 KH



**BUCKEYE PARTNERS, L.P.**

February 12, 2020

Mr. Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
U. S. Department of Transportation  
840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628

One Greenway Plaza  
Suite 600  
Houston, TX 77046  
Tel (832) 615-8600  
Fax (832) 615-8601

RE: CPF 1-2020-6001 Notice of Probable Violation and Proposed Civil Penalty – PHMSA 2018

Dear Mr. Burrough:

Buckeye Partners, L.P. (Buckeye) has reviewed the referenced Notice of Probable Violation and Proposed Civil Penalty (NOPV) received on January 21, 2020 relating to the accident on Buckeye's Florida Everglades Pipeline System PE904MI located near Miami, Florida.

**Item No. 1** - Buckeye does not contest the alleged proposed civil penalty Item No. 1 and will proceed with payment of the assessed civil penalty.

**Item No. 2** - Buckeye corrected the map of this location immediately following the accident.

**Item No. 3** - Buckeye herein provides additional information regarding the line markers identified on Buckeye's Florida Everglades Pipeline System PE904MI.

Buckeye's Damage Prevention Manual Section 2.4.1.1 reads:

2.4 Line Markers

2.4.1 Line markers shall accurately identify the rights of way. Line markers shall also be installed at each side of road crossings, navigable waterway crossings, and railroad crossings, and at all locations where the mainline pipe is aboveground and accessible to the public. Pipeline markers shall be installed on both ends of a pipe span.

2.4.1.1 Where feasible, line markers shall be placed along the pipeline right of way at intervals determined by "line of sight." Line of sight shall be defined as the number of line markers such that potential excavators, emergency responders, and members of the public can observe an unobstructed sight line between each line marker along the pipeline right of way and be aware of the approximate location of the pipeline.

The pipeline marker was located within the right-of-way as evidenced in the picture taken prior to the accident. See Attachment 1. Buckeye respectfully requests the withdrawal of this warning item from this Notice of Proposed Violation.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Hollis", is written over a white background.

Bill Hollis  
Executive Vice President, Buckeye Services

cc: C. Smith, C. Pankowski, C. Ostach, P. Monaghan, B. Serra, D. Boone