

By Electronic Mail

April 6, 2021

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

**Re: Buckeye Partners, L.P.
Corrective Action Order, CPF 1-2021-034-CAO
Withdrawal of Request for Hearing**

Dear Mr. Burrough:

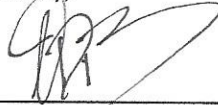
The Pipeline and Hazardous Materials Safety Administration (PHMSA) issued the above referenced Corrective Action Order (CAO) to Buckeye Partners, L.P. (Buckeye or the Company) on March 19, 2021, following a failure that occurred on March 16, 2021, on Buckeye's Line 602, a 12-inch transmission line, in Linden, New Jersey. Buckeye timely requested the opportunity to further discuss the scope of the CAO by letter dated March 29, 2021, specifically with respect to the definition of "Affected Pipelines" and the inclusion of Line 607 within that broad definition. That request was accepted by PHMSA as a request for a hearing, per PHMSA's letter of March 30, 2021.

The CAO broadly defines "Affected Pipelines" to include "Buckeye's 12-inch Line 602, Buckeye's 12-inch Line 601, and Buckeye's 8-inch Line 607 in Linden, New Jersey." Underlying this scope, the CAO concludes that there is a "likelihood that similar conditions conducive to corrosion exist on Buckeye's other pipelines in the Linden Area pipeline system." CAO, p. 3. Buckeye presented information to PHMSA during a meeting with the Agency on March 29, 2021, and in a subsequent submittal on March 30, 2021, demonstrating that Line 607 is notably distinct from Lines 602 and 601. PHMSA notified Buckeye by email on April 6, 2021, that the Agency "reviewed the data submitted on Line 607 and agree[s] that the data, the conditions, and the assessment results show that Line 607 differs from Lines 601 and 602." PHMSA further relayed that it intends to amend the CAO to exclude Line 607 from the scope and definition of "Affected Pipelines."

Given PHMSA's decision to exclude Line 607 from the scope and definition of "Affected Pipelines" and to amend the CAO to reflect that change along with other agreed upon revisions, including extensions of time that have been agreed to, the parties have reached agreement on the terms of the CAO. Buckeye appreciates PHMSA's willingness to engage in productive discussions to resolve the issues presented by the CAO. Based on those discussions and correspondence, the need for a hearing is eliminated, and Buckeye hereby withdraws its Request for Hearing regarding the above referenced CAO.

Thank you for your continued cooperation in response to this incident, and Buckeye will continue to work collaboratively with the PHMSA Eastern Region on this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,



Claudia Pankowski
Director Regulatory Compliance
Buckeye Partners, LP

cc: Mr William R. Serra, Vice President Operations, East Region, Buckeye Partners, LP
Mr. Carl A. Ostach, Vice President, Domestic Field Operations, Buckeye Partners, LP
Mr. Mark B. Shook, Director, Asset Integrity, Buckeye Partners, LP
Ms. Catherine Little, Troutman Pepper, LLP