



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

901 Locust Street, Suite 462
Kansas City, MO 64106-2641

**NOTICE OF PROBABLE VIOLATION
PROPOSED CIVIL PENALTY
and
PROPOSED COMPLIANCE ORDER**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 10, 2007

Mr. Brian Jury
Vice President, Field Operations
Buckeye Partners, L P.
5002 Buckeye Road
Emmaus, PA 18049-0368

CPF 3-2007-5026

Dear Mr Jury.

On October 17-21, 2005, October 31 - November 4, 2005, November 14-18, 2005, and March 13-16, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your pipeline facilities in Illinois, Indiana, Ohio, and Michigan, and your compliance records in Emmaus, Pennsylvania

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

- 1. §195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.**

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) Making construction records, maps, and operating history available as necessary for safe operation and maintenance.

Buckeye Partners did not follow its procedures for making accurate maps available for the safe operation and maintenance of their Two Rivers Pipeline. Field personnel on the Two Rivers Pipeline were found to be using 1950's edition alignment sheets; these alignment sheets did not contain accurate pipeline information. Specifically, the alignment sheets were missing main line block valves at MP 77, MP 102 1 and the Olney Station. Additionally, the alignment sheets did not show the Kirkwood Station that was built in 2000. The alignment sheets also showed the Lawrenceville Station that was removed in 2000 and the Bridgeport Junction that was removed in 1993

2. §195.404 Maps and records.

(c)(3) A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer.

(a) Buckeye Partners did not have records of the following monthly breakout tank inspections required by 195.432:

Location	Number of Tanks	Date
Clermont	2	1-03; 2-03, 3-03; 4-03, 6-03, 7-03, 8-03; 11-03
Huntington	6	1-03, 3-03, 4-04, 6-05
Lima	13	1-03; 2-03, 3-03; 5-03; 6-03; 7-03, 8-03; 9-03; 10-03; 11-03; 12-03; 1-04 ;2-04 ; 3-04,5-04 ;7-04 ;8-04 ,9-04, 11-04 ;12-04; 1-05 ;3-05
Cleveland Drydock	1	11-04
Bay City	1	7-04; 3-05
Flint	1	9-03; 2-04; 6-04, 9-04; 11-04; 3-05
Owosso	1	3-05, 6-05
Toledo	1	1-04

- (b) Buckeye Partners did not have records of the following main line block valves inspections required by 195 420

Valve	Description	Date
Shell ML Valve	DB999B12B	2 nd Inspection 2004
Total Junction	DB999TJV2A	2 nd Inspection 2004
Wayne Station	KR209WW17E	2 nd Inspection 2004
Detroit Property	WD201WJV15D	2 nd Inspection 2004
Detroit Property	WD202DBV15D	2 nd Inspection 2004
Wayue Sta	WJ201WWVOE	2 nd Inspection 2004
Wayne Property	WJ201WWV0D	2 nd Inspection 2004
Wayne Sta	WJ205WWV0Z	2 nd Inspection 2004
Wayne Sta Valve By Radio	WS209WWV17E	1 st Inspection 2003
Wayne Sta M/L by Radio	WS209WWV17E	2 nd Inspection 2004
Detroit Station	WS212WDV56D	2 nd Inspection 2004
Wayne Station	WW206WNV0E	2 nd Inspection 2004
Novi Property	WW206WNV16D	2 nd Inspection 2004
65 th St	JJ403CLV90A	2 nd Inspection 2003
Property Lne	JJ403CLV95D	2 nd Inspection 2003
Whistler Rd	XB403JJV58A	2 nd Inspection 2003
Hinkle Rd & 225 th St	XB403JJV66A	2 nd Inspection 2003
Bald Eagle Rd	WC203WV40A	1 st Inspection 2005
Irish Rd	WC203WV53A	1 st Inspection 2005
Cold Water & Center	WC203WV67A	1 st Inspection 2005
Joan Rd	WD201WJV6A	1 st Inspection 2005
Ashland Jct	WD201WJV9A	1 st Inspection 2005
W of Flint River	WF207WZV10A	1 st Inspection 2005
Owosso	WF207WZV31D	1 st Inspection 2005
WS Property Line Valve	WS999A1V0A	2 nd Inspection 2004
WS Property Line Valve	WS999A1V0A	1 st Inspection 2005

- (c) Buckeye Partners did not have records of the Bradley Road relief valve inspection required by 195.428 on the Toledo to Cleveland pipeline in 2004.
- (d) Buckeye Partners does not maintain individual records of monthly breakout tank inspections required by 195 432 for each breakout tank at multi-tank facilities. Buckeye's present record-keeping system groups all breakout tanks by location and only one record is completed for that location. Part 195.404 (c) (3) requires a record be maintained of each inspection completed to meet the requirements of Part 195. Buckeye Partners' inspection documentation process does not for multi-tank facilities meet the requirements of 195 404(c)(3)

3. §195.410 Line markers.

(a) Except as provided in paragraph (b) of this section, each operator shall place and maintain line markers over each buried pipeline in accordance with the following:

(2) The marker must state at least the following on a background of sharply contrasting color:

(i) The word "Warning," "Caution," or "Danger" followed by the words "Petroleum (or the name of the hazardous liquid transported) Pipeline"...

(ii) The name of the operator and a telephone number (including area code) where the operator can be reached at all times.

- (a) The line markers placed at the span crossing at East 55th Street in Cleveland, Ohio on the 523 pipeline did not identify Buckeye as the operator or display a 24 hour telephone number
- (b) Buckeye Partners had line markers displaying the phone number 215-967-3131. This phone number is not in service. The pipeline line markers did not state a correct telephone number where the operator could be reached at all times. These erroneous line markers were found at various locations in Ohio and Indiana, specifically

1 line marker at the Clermont Station

1 line marker south of Zionsville, IN at a creek near Retriever Lane, on the 403 pipeline section

2 line markers southeast of Hilliard Park on the 401 pipeline section

1 line marker southeast of the Crosgray MLBV on the 401 pipeline section

South of Adams Road at a fence row on the 401 pipeline Section.

1 line marker east of the Wonderlick Road Block Valve on the 003 pipeline section

1 line marker at the Cygnet Pump station

1 line marker at County Road 109 on the 411 pipeline section

1 line marker near Hummel and 130th Street on the 316 pipeline section

1 line marker near Middlebrook and Holland Streets on the 316 pipeline section

1 line marker near Stroud and Smith Streets on the 316 pipeline section

1 line marker at the intersection of Fry Road and the 316 pipeline section

1 line marker approximately 1000 feet north of the Main Street Block Valve on the 316 pipeline section

1 line marker at the Warrenville Road Rectifier on the 523 pipeline section

1 line marker at approximately MP 20 on the 523 pipeline section

1 line marker approximately 200' east of the Liberty Road Block Valve on 523 pipeline section

(c) Buckeye Partners had line markers displaying an inaccurate phone number 216-274-2234 which was at one time the Mantua Station. This phone number now reaches a law firm not associated with Buckeye Partners. The pipeline line markers did not state a correct telephone number where the operator could be reached at all times. The location of these inaccurate line markers are:

- 1 line marker at 8+07 on the 523 pipeline section
- 1 line marker at 23+99 on the 523 pipeline section
- 1 line marker at 28+58 on the 523 pipeline section
- 1 line marker approximately 100 yards west of the Rogers Block Valve
- 1 line marker at the Treet Road crossing on the 523 pipeline section

(d) Buckeye Partners had 4 line markers near MP 174 and 3 line markers near MP 172 on the Two Rivers Pipeline that do not contain the correct name and emergency phone number. These line markers displayed the Equilon name and the Equilon emergency phone number 800-634-4325.

4. §195.410 Line markers.

(c) Each operator shall provide line marking at locations where the line is above ground in areas that are accessible to the public.

Buckeye Partners did not place a line marker at the above ground span located at approximately MP 175 on the Two Rivers System, which was obtained from Equilon, as required by 195.410 (c).

5. §195.412 Inspection of rights-of-way and crossings under navigable waters.

(a) Each operator shall, at intervals not exceeding 3 weeks, but at least 26 times each calendar year, inspect the surface conditions on or adjacent to each pipeline right-of-way. Methods of inspection include walking, driving, flying or other appropriate means of traversing the right-of-way.

Buckeye Partners did not perform an adequate patrol by providing inspection of surface conditions along one 500' section of their Wayne to Detroit pipeline in the vicinity of Interstate 94, south of Outer Drive, and north of Southfield Road in Allen Park, Michigan. This area of right-of-way contained dense overgrowth and was only patrolled by aircraft.

6. §195.452 Pipeline integrity management in high consequence areas.

(h) What actions must an operator take to address integrity issues?

(1) General requirements. An operator must take prompt action to address all

anomalous conditions that the operator discovers through the integrity assessment or information analysis.

(2) Discovery of condition. Discovery of a condition occurs when an operator has adequate information about the condition to determine that the condition presents a potential threat to the integrity of the pipeline. An operator must promptly, but no later than 180 days after an integrity assessment, obtain sufficient information about a condition to make that determination, unless the operator can demonstrate that the 180-day period is impracticable.

Buckeye Partners did not promptly determine that a condition presenting a potential threat to the integrity of its 301 pipeline was present. Sufficient information to identify an integrity threat meeting the criteria for an immediate repair condition at wheel count 72475 1 was reported to Buckeye in an ILI vendor's final report on 2/27/04. However, Buckeye's records show that it did not make the required determination until 4/5/04. This immediate repair condition involved a dent on the top of the pipe and metal loss and was located in a high consequence area.

7. §195.452 Pipeline integrity management in high consequence areas

(h) What actions must an operator take to address integrity issues?

(4) Special requirements for scheduling remediation.

(i) Immediate repair conditions. An operator's evaluation and remediation schedule must provide for immediate repair conditions. To maintain safety, an operator must temporarily reduce operating pressure or shut down the pipeline until the operator completes the repair of these conditions. An operator must calculate the temporary reduction in operating pressure using the formula in section 451.7 of ASME/ANSI B31.4. An operator must treat the following conditions as immediate repair conditions:

(C) A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) that has any indication of metal loss, cracking or a stress riser.

Buckeye Partners did not reduce the pressure or shut down the 301 pipeline when they became aware of the immediate repair condition described in Item 6 above.

Buckeye Partners records indicate that the pipeline remained in operation without a reduction in operating pressure between the discovery date and the date of repair (4/15/04).

8. §195.452 Pipeline integrity management in high consequence areas

(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:

- (8) A process for review of integrity assessment results and information analysis by a person qualified to evaluate the results and information.**

Buckeye Partners did not ensure that its process for review of integrity assessment results by qualified personnel was fully implemented. Buckeye Partners personnel failed to identify inaccuracies in the Nondestructive Inspection Report (NDT) and Office Report associated with a 4/15/04 anomaly dig and investigation on the 301 pipeline in Troy Township, Wood County, Ohio. This is the same anomaly referred to in Items 6 and 7 above. Specifically, the Nondestructive Inspection Report had inaccurate GPS coordinates for the anomaly (the report listed GPS coordinates for Northwestern Indiana not Northwestern Ohio) and the wrong state (the report listed Illinois not Ohio). Additionally, the Office Report indicated the Depth of Defect as 0.177" when the actual depth of defect was 0.044". These inaccuracies were brought to Buckeye Partners' attention during the OPS inspection.

9. §195.583 What must I do to monitor atmospheric corrosion control?

(a) You must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, at least once every 3 calendar years, but with intervals not exceeding 39 months for onshore pipelines.

- (a) Buckeye Partners was unable to provide records demonstrating that atmospheric corrosion inspections were done on 4 spans located at approximately MP 171.9, 172, 175, and 175.5 on the Two Rivers Pipeline during the three year period preceding the date of the OPS inspection.
- (b) Buckeye Partners did not inspect and document an atmospheric corrosion examination on an exposure located in an underground vault at approximately 20+59 on the Erie Junction to Dry Dock pipeline section during the three year period preceding the OPS inspection.

Proposed Civil Penalty

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of \$202,000 as follows.

<u>Item number</u>	<u>PENALTY</u>
2 (a)	\$ 9,000
2 (b)	\$ 9,000
2 (c)	\$ 9,000
5	\$ 35,000
6	\$ 70,000
7	\$ 70,000

Warning Item

With respect to items 2(d), 4, 8, and 9 (b) we have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to promptly correct these items. Be advised that failure to do so may result in Buckeye Partners' being subject to additional enforcement action.

Proposed Compliance Order

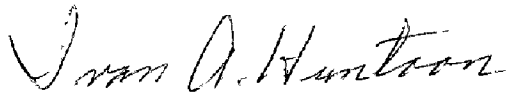
With respect to items 1, 3(a)-(d), and 9 (a) pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Buckeye Partners. Please refer to the *Proposed Compliance Order* which is enclosed and made a part of this Notice.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

In your correspondence on this matter, please refer to **CPF 3-2007-5026** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



Ivan A. Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Compliance Proceedings

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Buckeye Partners a Compliance Order incorporating the following remedial requirements to ensure the compliance of Buckeye Partners with the pipeline safety regulations:

1. In regard to Item Number 1 of the Notice pertaining to making accurate maps available to operating personnel:

Within 90 days after receipt of a final order, make accurate updated maps available to all field personnel on the Two Rivers Pipeline System.

2. In regard to Item Number 3(a)-(d) of the Notice pertaining to inaccurate telephone numbers on some of your line markers

Within 90 days after receipt of a final order, present a plan and schedule for the updating of all Buckeye Partners line markers to only display a working telephone number or numbers. The plan and schedule of updating of all line markers shall require that all work will be completed within 365 days of the final order.

3. In regard to Item Number 9(a) of the Notice pertaining to inspection of exposed pipe on the Two Rivers Pipeline System for atmospheric corrosion:

Within 90 days after receipt of a final order, present a plan and work schedule for identifying and inspecting all exposed pipe on the Two Rivers Pipeline System and all other pipeline assets acquired from Equilon. The plan and schedule shall require that all work will be completed within 365 days of the final order.

4. Buckeye Partners shall maintain documentation of the safety improvement and compliance costs associated with fulfilling this Compliance Order and submit the total to Ivan A. Huntoon, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. Costs shall be reported in two categories. 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure. These costs shall be reported within 90 days after the completion of the task in this Compliance Order

Response Options for Pipeline Operators in Compliance Proceedings

The requirements of 49 C.F.R. Part 190, Subpart B (§§ 190.201–190.237) govern response to Notices issued by a Regional Director, Pipeline and Hazardous Materials Safety Administration (PHMSA)

Be advised that all material submitted by a respondent in response to an enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

I Procedures for Responding to a NOTICE OF PROBABLE VIOLATION:

Within 30 days of receipt of a Notice of Probable Violation, the respondent shall respond to the Regional Director who issued the Notice in the following way

a When the Notice contains a proposed CIVIL PENALTY* --

1. Pay the proposed civil penalty and advise the Regional Director of the payment. This authorizes PHMSA to make findings and to close the case with prejudice to the respondent. Payment terms are outlined below;
2. Submit written explanations, information, or other materials in response to the allegations and/or seek elimination or mitigation of the proposed civil penalty. Refer to 49 C.F.R. § 190.225 for assessment considerations, which include the respondent's ability to pay and the effect on the respondent's ability to stay in business, upon which civil penalties are based, or
3. Request a hearing as described below to contest the allegations and/or proposed assessment of a civil penalty.

b When the Notice contains a proposed COMPLIANCE ORDER* --

1. Notify the Regional Director that you intend to take the steps in the proposed compliance order.
2. Submit written explanations, information, or other materials in answer to the allegations in the Notice and object to or seek clarification of the proposed compliance order items in whole or in part; or
3. Request a hearing as described below to contest the allegations and/or proposed compliance order items.

c. When the Notice contains a **WARNING ITEM** --

No written response is required. The respondent is warned that if it does not take appropriate action to correct these items, enforcement action will be taken if a subsequent inspection reveals a violation.

* Failure of the respondent to respond to the Notice within 30 days of receipt constitutes a waiver of the right to contest the allegations in the Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in the Notice without further notice to the respondent and to issue a Final Order.

II. **Procedures for Responding to a NOTICE OF AMENDMENT*--**

Within 30 days of receipt of a Notice of Amendment, the respondent shall respond to the Regional Director who issued the Notice in the following way:

- a. Notify the Regional Director of your plans to address the inadequacies identified in the Notice;
- b. Submit written explanations, information, or other materials in answer to the allegations in the Notice and/or object to or seek clarification of the proposed amendment items in whole or in part; or
- c. Request a hearing as described below to contest the allegations in the Notice.

* Failure of the respondent to respond to the Notice within 30 days of receipt constitutes a waiver of the right to contest the allegations in the Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in the Notice without further notice to the respondent and to issue a Final Order.

III. **Procedure for Requesting a Hearing**

A request for a hearing must be in writing and accompanied by a statement of the issues that the respondent intends to raise at the hearing. The issues may relate to the allegations, new information, or to the proposed compliance order or proposed civil penalty amount. Refer to 49 C.F.R. § 190.225 for assessment considerations upon which civil penalties are based. A respondent's failure to specify an issue may result in waiver of the right to raise that issue at the hearing. The respondent's request must also indicate whether or not the respondent will be represented by counsel at the hearing. Failure to request a hearing in writing within 30 days of receipt of a Notice waives the right to a hearing. In addition, if the amount of the proposed civil penalty or the proposed corrective action is less than \$10,000, the hearing will be held by telephone, unless the respondent submits a written request for an in-person hearing. Complete hearing procedures can be found at 49 C.F.R. § 190.211.

IV. **Extensions of Time**

An extension of time to prepare an appropriate response to a Notice may be granted, at the agency's discretion, following submittal of a written request to the Regional Director. The request must indicate the amount of time needed and the reasons for the extension. The request must be submitted within 30 days of receipt of the Notice.

V. **Freedom of Information Act**

Any material prepared by PHMSA, including the violation report, the Notice, and any order issued in this case, and any material provided to PHMSA by the respondent, may be considered public information and subject to disclosure under the Freedom of Information Act (FOIA). If the information you provide is security sensitive, privileged, confidential or may cause your company competitive disadvantages, please clearly identify the material and provide justification why the documents, or portions of a document, should not be released under FOIA. If we receive a request for your material, we will notify you if PHMSA, after reviewing the materials and your provided justification, determines that withholding the materials does not meet any exemption provided under the FOIA. You may appeal the agency's decision to release material under the FOIA at that time. Your appeal will stay the release of those materials until a final decision is made.

VI. **Small Business Regulatory Enforcement Fairness Act Information**

The Small Business and Agricultural Regulatory Enforcement Ombudsman and 10 Regional Fairness Boards were established to receive comments from small businesses about federal agency enforcement actions. The Ombudsman will annually evaluate the enforcement activities and rate each agency's responsiveness to small business. If you wish to comment on the enforcement actions of the Pipeline and Hazardous Materials Safety Administration, call 1-888-REG-FAIR (1-888-734-3247) or go to http://www.sba.gov/ombudsman/dsp_faq.html

VII PAYMENT INSTRUCTIONS

Civil Penalty Payments of Less Than \$10,000

Payment of a civil penalty of less than \$10,000 proposed or assessed, under Subpart B of Part 190 of the Pipeline Safety Regulations can be made by certified check, money order or wire transfer. Payment by certified check or money order (containing the CPF Number for this case) should be made payable to the "Department of Transportation" and should be sent to:

Federal Aviation Administration
 Mike Monroney Aeronautical Center
 Financial Operations Division (AMZ-341) P O. Box 25082
 Oklahoma City, OK 73125-4915

Wire transfer payments of less than \$10,000 may be made through the Federal Reserve Communications System (Fedwire) to the account of the U S Treasury Detailed instructions are provided below Questions concerning wire transfer should be directed to the Financial Operations Division at (405) 954-8893, or at the above address

Civil Penalty Payments of \$10,000 or more

Payment of a civil penalty of \$10,000 or more proposed or assessed under Subpart B of Part 190 of the Pipeline Safety Regulations must be made wire transfer (49 C F R. § 89.21 (b)(3)), through the Federal Reserve Communications System (Fedwire) to the account of the U.S. Treasury. Detailed instructions are provided below. Questions concerning wire transfers should be directed to the Financial Operations Division at (405) 954-8893, or at the above address.

INSTRUCTIONS FOR ELECTRONIC FUND TRANSFERS

(1) <u>RECEIVER ABA NO</u> 021030004	(2) <u>TYPE/SUB-TYPE</u> (Provided by sending bank)
(3) <u>SENDING BANK ABA NO.</u> (Provided by sending bank)	(4) <u>SENDING BANK REF NO</u> (Provided by sending bank)
(5) <u>AMOUNT</u>	(6) <u>SENDING BANK NAME</u> (Provided by sending bank)
(7) <u>RECEIVER NAME</u> TREAS NYC	(8) <u>PRODUCT CODE</u> (Normally CTR, or as provided by sending bank)
(9) <u>BENEFICIAL (BNF) = AGENCY LOCATION CODE</u> BNF = /ALC-69-14-0001	(10) <u>REASONS FOR PAYMENT</u> Example PHMSA - CPF # / Ticket Number/Pipeline Assessment number

INSTRUCTIONS: You, as sender of the wire transfer, must provide the sending bank with the information for blocks (1), (5), (7), (9), and (10). The information provided in Blocks (1), (7), and (9) are constant and remain the same for all wire transfers to the Pipeline and Hazardous Materials Safety Administration, Department of Transportation.

Block #1 - RECEIVER ABA NO. - "021030004" Ensure the sending bank enters this 9-digit identification number, it represents the routing symbol for the U.S. Treasury at the Federal Reserve Bank in New York.

Block #5 - AMOUNT - You as the sender provide the amount of the transfer. Please be sure the transfer amount is punctuated with commas and a decimal point. **EXAMPLE: \$10,000.00**

Block #7 - RECEIVER NAME - "TREAS NYC". Ensure the sending bank enters this abbreviation. It must be used for all wire transfers to the Treasury Department.

Block #9 - BENEFICIAL - AGENCY LOCATION CODE - "BNF=/ALC-69-14-0001". Ensure the sending bank enters this information. This is the Agency Location Code for the Pipeline and Hazardous Materials Safety Administration, Department of Transportation.

Block #10 - REASON FOR PAYMENT - "AC-payment for PHMSA Case # / To ensure your wire transfer is credited properly, enter the case number/ticket number or Pipeline Assessment number, and country."

NOTE: A wire transfer must comply with the format and instructions or the Department cannot accept the wire transfer. You as the sender can assist this process by notifying the Financial Operations Division (405) 954-8893 at the time you send the wire transfer.

May 2007