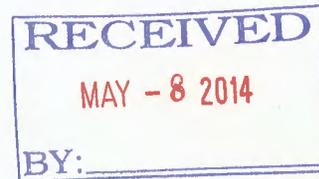




BUCKEYE DEVELOPMENT & LOGISTICS, LLC



May 7, 2014

Mr. R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
8701 South Gessner, Suite 1110
Houston, TX 77074

RE: CPF 4-2014-5008 – Notice of Probable Violation and Proposed Compliance Order
Buckeye Development & Logistics, LLC – Liberty Office Records Review

Dear Mr. Seeley:

Upon review of the referenced Notice of Probable Violation (NOPV) and Proposed Compliance Order received on April 15, 2014 from the Pipeline and Hazardous Materials Safety Administration (PHMSA) relating to the 2013 inspection of records and procedures at Buckeye Development & Logistics (Buckeye) Liberty, TX office, Buckeye does not contest the Notice of Probable Violation.

The NOPV specifically addresses information associated with an integrity assessment of the 6-inch Ethane pipeline that is owned by SASOL North America Inc. that was performed in 2010 by PB Energy, who was the operator of the 6-inch pipeline at the time. To clarify the NOPV, Buckeye did not acquire this pipeline from an ownership perspective but did become the operator in January 2011.

In order to more closely follow the Part 195 regulations and provide for flexibility in the investigation timeframe, where necessary, Buckeye requests the following modifications to Items 1 and 2 of the Proposed Compliance Order:

1. Revise the third and fourth sentences of Item 1 to require that within 30 days of receipt of the Final Order "Buckeye will perform the required investigation of the internal metal loss under 195.579(a) and provide the results of the investigation and a plan for mitigation of internal corrosion based on the investigation." This language more closely follows the Pipeline Safety Regulations, Title 49, CFR Part 195.579(a).
2. Buckeye also proposes that language be added to Item 2 the Proposed Compliance Order that would allow an extension of time to the proposed 30 day timeframe for completion of the investigation and formulation of the mitigation plan for cause provided that such a request for extension is timely filed with the Director, Southwest Region and approved.

3. Finally with regard to the review and amendment of Buckeye's internal corrosion procedures referenced under Item 1, Buckeye proposes to revise its procedures to ensure investigation of in-line inspection tool indications of metal loss. However, Buckeye believes that making specific references to "dead legs", low-flow lines and infrequently used pump station lines in its procedures are not warranted. These specific terms are not defined in 49 CFR Part 195 nor is this specific language included in §195.579. The Company's corrosion control procedures apply to all pipelines subject to 49 CFR Part 195, which should ensure that all investigations required under §195.579 will be performed on all pipelines subject to PHMSA regulation.

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

Sincerely,

A handwritten signature in blue ink that reads "Thomas S. Collier". The signature is written in a cursive style and is placed on a light yellow rectangular background.

Thomas S. (Scott) Collier
Vice President, Performance Assurance & Asset Integrity
Buckeye Partners, L.P.

cc: B. Ball
C. Ostach
D. Corbello
C. Pankowski
M. Shook