



BUCKEYE PARTNERS

4200 Westheimer Rd. Ste 975, Houston, TX 77027

May 15, 2024

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

RE: CPF 1-2024-001-NOPV:

Dear Mr. Burrough,

Buckeye Partners, LP (Buckeye) received a Notice of Probable Violation (NOPV) and Proposed Compliance Order dated March 21, 2024, issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), with regard to the inspection of Buckeye's integrity management program that took place from June 2, 2022 to October 12, 2022.

The notice alleges a violation of 49 C.F.R. § 195.452(i)(4) for failure to conduct an adequate Emergency Flow Restricting Device (EFRD) evaluation.

Without admission, Buckeye does not contest the NOPV and will comply with the Proposed Compliance Order. Within 180 days of receipt of the Final Order Buckeye will:

- (1): Reevaluate the criteria for selecting the location of EFRDs as to comply with § 195.452(i)(4) and update its process and submit revised procedures to the PHMSA Eastern Region; and
- (2): Submit a plan to the PHMSA Eastern Region for completing an updated EFRD evaluation utilizing the updated process for relevant segments.

Buckeye prioritizes pipeline safety and integrity. Please do not hesitate to contact me if you need additional information.

Sincerely,

Craig Brown

Craig Brown
Sr. Dir., Public Affairs and Regulatory Compliance