



BUCKEYE PARTNERS

The Buckeye Building, 6161 Hamilton Blvd. Allentown, PA 18106

July 11, 2025

By Electronic Mail

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

Re: Notice of Probable Violation and Proposed Compliance Order, CPF No. 1-2025-001-NOPV

Dear Director Burrough:

Buckeye Partners, LP (Buckeye or the Company) is in receipt of the above-referenced Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO), issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) on May 30, 2025. The NOPV alleges certain violations of 49 C.F.R. Part 195 related to welding and includes three PCO actions. On June 20, 2025, PHMSA granted an extension of time allowing Buckeye to respond to the NOPV by July 11, 2025; therefore, this response is timely.

Buckeye is committed to operating its system in full compliance with the federal pipeline safety regulations, including welding requirements and its welding procedures. For the purposes of cooperation and without admission, Buckeye does not contest the alleged probable violations set forth in the NOPV (or the associated PCO items) related to welding performed during construction of two small diameter low pressure pipelines, L931 and L932, that transport product a short distance between two terminals in an industrial area in Tampa, Florida. During construction of the pipelines between 2018 and 2020, one hundred percent (100%) of the welds were nondestructively evaluated pursuant to API 1104 criteria and successfully hydrostatically tested prior to being placed into service, and the pipelines have operated safely since that time.

In advance of the underlying 2023 inspection, Buckeye identified certain welder qualification and recordkeeping discrepancies that it voluntarily disclosed to PHMSA. In coordination with the PHMSA Eastern Region, Buckeye prepared a weld validation and testing plan to further verify the strength and ductility of a representative sample of welds, which was reviewed by PHMSA and finalized on October 24, 2024. The plan was prepared in consultation with independent welding experts at DNV and internal subject matter experts at Buckeye, and in consideration of relevant

technical industry standards. Since finalization of the plan last October, Buckeye has progressed with its implementation in close coordination and communication with the PHMSA Eastern Region, including associated testing and review which has in all cases reaffirmed the strength and ductility of the welds on L931 and L932, in excess of the 5% required by the PCO.

These actions address the PCO items included in the NOPV, which are largely complete at this time. Buckeye will continue to proceed with completing the actions specified in the plan and timely comply with the remaining PCO items as set forth in a forthcoming Final Order. Because a majority of the PCO items have already been implemented in close coordination with PHMSA, Buckeye understands the following actions can be relied upon to satisfy a forthcoming compliance order that finalizes the PCO: (1) actions already performed by Buckeye in support of the weld plan and (2) those actions which will be performed in advance of issuance of a Final Order and compliance order.

Buckeye is committed to pipeline safety and appreciates PHMSA's coordination in this matter. In the interest of further cooperation, Buckeye is not contesting the probable violations set forth in the NOPV or the PCO items, with the caveats contained herein. Buckeye expressly does not, however, admit to the factual or legal allegations, statements, or characterizations in the NOPV or the associated pipeline safety violation report prepared in support of the same.

If you have any questions, please do not hesitate to contact me.

Respectfully,



Robert C. Osika
Director, DOT Compliance

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