



BUCKEYE PARTNERS

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

April 30, 2026

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. 1-2026-003-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 February 13, 2026. The NOPV alleges certain violations of 49 C.F.R. Part 195 related to field-applied coatings, including two (2) warning items (Items 1 and 3) and one (1) allegation with associated PCO actions (Item 2). On March 13, 2026, PHMSA granted an extension of time allowing Buckeye to respond to the NOPV by April 30, 2026; therefore, this response is timely.

Buckeye is committed to operating its system in full compliance with the federal pipeline safety regulations, including those applicable to construction specifications and field-applied coatings. Without admission, Buckeye does not contest the alleged probable violations set forth in the NOPV (or the associated PCO items). The pipelines at issue – L931 and L932 – are two small diameter low pressure pipelines constructed between 2018 and 2020 that transport product a short distance between two terminals in an industrial area in Tampa, Florida. In response to the NOPV and in the spirit of cooperation, Buckeye voluntarily proceeded with implementation of the PCO in coordination with PHMSA and respectfully submits the following information which confirms the integrity and effectiveness of the pipeline coating and supports satisfaction of the PCO.

The PCO proposes to require that Buckeye perform the following within 90 days of receipt of a Final Order: (1) a coating assessment of the two pipelines using aboveground survey techniques, (2) repair of any “severe” indications as defined in NACE SP-0502-2010, Section 4, and (3) as “deemed necessary” the development of a coating integrity monitoring plan. The PCO also proposes to require notice to PHMSA in advance of the assessment and submission of the assessment results within 30 days of completion of the assessment.

In coordination with the Eastern Region Director, Buckeye performed the coating assessment using a Direct Current Voltage Gradient (DCVG) survey on the accessible buried portions of the L931 and L932 pipelines during the week of April 13, 2026. A PHMSA representative was present to observe the survey.

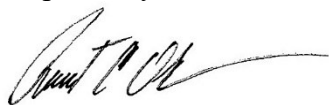
As discussed recently with PHMSA, the DCVG survey did not identify any coating indications, thereby confirming the integrity and effectiveness of the applied coating on both the L931 and L932 pipelines and consistent with a newly constructed pipeline. Given the limitations of the DCVG survey technique, portions of buried piping on L931 and L932 could not be surveyed due to ground cover conditions (e.g., paved road crossings, piping installed via directional drill, or other right-of-way restrictions). A total of approximately 11,100 feet (or 79%) of the buried portion was accessible and was surveyed. An assessment report with the final results, along with the criteria used to assess coating damage and defect severity will be provided to PHMSA by May 16, 2026 (within 30 days from the completion of the survey).

Based on the survey results – which did not identify any coating indications – Buckeye believes that the remaining proposed PCO actions are not applicable, including repair of “severe” indications (there were none) and the development of a coating integrity monitoring plan (which is unnecessary given there were no identified DCVG indications). Further, Buckeye respectfully requests that the PCO be deemed complete in any forthcoming Final Order, pending PHMSA’s review of the final report.

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, with the caveats contained herein, and voluntarily proceeded to implement the PCO with notice and coordination with PHMSA. Those actions confirm the integrity of the coating on buried portions of L931 and L932 and satisfy the terms of the PCO. 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. The coating assessment results (confirming no DCVG indications) combined with 2025 inline inspection (ILI) results (which found no actionable metal loss anomalies and will be included with the DCVG assessment report) fully demonstrate the integrity of lines L931 and L932.

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

Respectfully,



Robert C. Osika
Director, DOT Compliance

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