



BUCKEYE PARTNERS

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

June 3, 2026

By Electronic Mail

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

RE: CPF 1-2026-052-WL

Dear Director Burrough:

Buckeye Partners L.P. (Buckeye) is in receipt of the referenced Warning Letter (WL) received on May 4, 2026, relating to the 2025 Integrated Inspection that took place from March 17, 2025, to November 13, 2025. Although a formal response is not required, Buckeye respectfully submits the following proposed procedural changes demonstrating compliance with the WL Finding as indicated below:

WL Finding:

Buckeye failed to follow the recommendations of section 8.3 in API RP 1162, which required measuring the development and implementation of the PAP. Section 8.3 in API RP 1162 required the operator to complete an annual audit or review of the PAP's development and implementation.

During the inspection, PHMSA personnel requested records pertaining to Buckeye's annual PAP implementation review. Buckeye provided an annual review work order (WO) for each calendar year from 2022 to 2024 and a log with annual revisions to its Public Awareness Manual. All annual work orders were completed using a Management System for Maintenance Work Orders and listed "Review Manual" as the type of work.

Work Order 2057801 dated June 23, 2023, and Work Order 2203113, dated September 20, 2024, listed the Public Awareness Manual sections and whether changes were necessary for each section. However, the WOs failed to include any details regarding the reasoning behind why changes were deemed necessary for certain sections. Therefore, Buckeye failed to record whether the PAP had been implemented and documented according to the written program in accordance with section 8.3 in API RP 1162.

Further, no specific measures listed in Appendix E in API RP 1162 were presented to demonstrate auditing of the program implementation. Therefore, Buckeye failed to follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, in accordance with section 195.440 (Public Awareness).

Buckeye Response: In response to the Warning Letter, Buckeye intends to continue documenting this annual review process utilizing a JD Edward's Work Order (WO); however, Buckeye will also implement a new, more robust review procedure and form that will detail the effectiveness of the program, including the reasoning behind any implemented changes, as required by, and detailed in, API RP 1162.

Buckeye believes that this new procedure and form will cover the RP1162 requirements for an operator to complete an annual audit or review of the PAP's development and implementation, as required in 195.440(c). Buckeye estimates that the new procedure and form will be implemented within the next sixty (60) days and will be utilized for the next annual review period.

If you have any questions, or need additional information, please feel free to contact me at your convenience. Thank you.

Respectfully,



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Buckeye Partners, L.P.

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