



BUCKEYE PARTNERS, L.P.

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October 10, 2013

Mr. Byron Coy
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2013-5019 Buckeye Partners, L.P. – New Haven, CT to Springfield, MA Pipeline
Inspection - Notice of Probable Violation

Dear Mr. Coy:

Buckeye Partners, L.P. (Buckeye) has reviewed the referenced Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (NOPV) received on September 13, 2013 from the Pipeline and Hazardous Materials Safety Administration relating to the September 2012 inspection of Buckeye's pipeline facilities between New Haven, CT and Springfield, MA.

Buckeye does not contest the items of the probable violations in the NOPV, and provides additional information regarding each item. Buckeye has made payment of the proposed civil penalty in the amount of \$69,100.

Referencing Item 1, Buckeye has filed a supplemental 2011 Annual Report (Report Number 20120359-12489) correcting the number of breakout tanks in Massachusetts from six to four. Buckeye will institute a revised process using its new tank database and local Operations input to ensure correct number of breakout tanks on future Annual Report submissions.

Regarding Item 2, the five inspections listed in the NOPV were performed within the fifteen month inspection interval, but missed the calendar year interval for 2011 by three days. Buckeye has reviewed the calendar year inspection interval requirements with its Operations personnel responsible for the New Haven to Springfield facilities. Buckeye will also be enhancing its compliance monitoring with Operations personnel to ensure completion of these future calendar year compliance requirements.

Referencing Item 3, Buckeye will adequately inspect the surface conditions of the pipeline right of way in the two areas listed in the NOPV using ground patrols until the tree canopy can be cut, which is scheduled for 2014.

Buckeye is committed to operating its pipeline facilities in a safe and responsible manner to ensure the safety of the public, the environment and its employees.

If you have any questions, or need additional information, please feel free to contact myself or John Reinbold, Manager, Compliance at 610-904-4185.

Sincerely,

Handwritten signature of Thomas S. Collier in cursive script.

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

cc: C.A. Ostach
J.J. Mattis
J.B. Reinbold