



SLOVER & LOFTUS LLP

ATTORNEYS AT LAW

A. REBECCA WILLIAMS

301026

August 27, 2020

ENTERED
Office of Proceedings
August 27, 2020
Part of
Public Record

VIA ELECTRONIC FILING

Ms. Cynthia T. Brown, Chief
Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

Re: Docket No. FD 36434, The Elk River Railroad, Inc. – Petition for
Retroactive Merger Exemption – The Buffalo Creek Railroad Company

Dear Ms. Brown:

Attached for filing in the above referenced docket is the Verified Petition of The Elk River Railroad, Inc. (“TERRI”) for Retroactive Exemption under 49 U.S.C. § 10502 From the Prior Approval Requirements of 49 U.S.C. §§ 11323-11325. The filing fee has been paid electronically via pay.gov.

Please note that TERRI is respectfully requesting expedited consideration of its Petition for the reasons stated therein.

Please contact the undersigned if you have any questions regarding this filing. Thank you for your attention to this matter.

Respectfully submitted,

A. Rebecca Williams
An Attorney for The Elk River Railroad, Inc.

Enclosure

FEE RECEIVED
August 27, 2020
SURFACE
TRANSPORTATION BOARD

FILED
August 27, 2020
SURFACE
TRANSPORTATION BOARD

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

THE ELK RIVER RAILROAD, INC. –	)	
Petition for Merger Exemption –	)	
The Buffalo Creek Railroad Company	)	Finance Docket No. 36434
	)	

**VERIFIED PETITION OF
THE ELK RIVER RAILROAD, INC. FOR
RETROACTIVE EXEMPTION UNDER 49 U.S.C. § 10502 FROM
THE PRIOR APPROVAL REQUIREMENTS OF 49 U.S.C. §§ 11323-11325**

EXPEDITED CONSIDERATION REQUESTED

THE ELK RIVER RAILROAD, INC.

William L. Slover
A. Rebecca Williams
SLOVER & LOFTUS LLP
1224 Seventeenth Street, N.W.
Washington, D.C. 20036
Phone: (202)-347-7170

Its Attorneys

Dated: August 27, 2020

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

THE ELK RIVER RAILROAD, INC. –	)	
Petition for Merger Exemption –	)	
The Buffalo Creek Railroad Company	)	Finance Docket No. 36434
	)	

VERIFIED PETITION FOR RETROACTIVE EXEMPTION

The Elk River Railroad, Inc. (“TERRI”), a Class III railroad, respectfully petitions the Surface Transportation Board (“STB” or “Board”) under 49 U.S.C. § 10502 and 49 C.F.R. §§ 1121.1 *et seq.* for a *nunc pro tunc* exemption from the prior approval and authorization requirements of 49 U.S.C. §§ 11323-25 to authorize the 1995 merger of The Buffalo Creek Railroad Company (“BCR”) with and into TERRI, the surviving corporation. At the time of the merger, both BCR and TERRI were Class III rail common carriers under the common control of Mr. William T. Bright (“Mr. Bright”), an individual.

During the course of its due diligence in regards to TERRI’s anticipated sale of the 18.0-mile Buffalo Creek and Gauley Railroad (“BC&G”) to the West Virginia State Rail Authority (the “State”), Counsel for TERRI discovered that although TERRI had appropriately notified, and filed Articles of Merger with, the West Virginia Secretary of State in 1995, TERRI did not seek prior authorization from the Board’s predecessor, the Interstate Commerce Commission (“ICC”). As explained herein, TERRI inadvertently failed to seek prior agency authorization for the merger due to oversight and lack of knowledge that additional agency approval was necessary, in light of the ICC’s 1992 exemption of Mr. Bright’s common control of BCR and TERRI for the purpose of rehabilitating and marketing TERRI and the BC&G together to attract new business. Had TERRI been aware at the time of the merger that ICC authorization was

needed, it would have been eligible to receive such authority through a timely filed notice of exemption under 49 C.F.R. § 1180.2(d)(3) for an intra-corporate family transaction. TERRI now seeks to expeditiously rectify that oversight.

The Board has granted *nunc pro tunc* exemptions to legitimize transactions that would have been appropriate for exemption had such relief been sought at the time, where the petitioner demonstrates its failure to seek authorization on a timely basis was unintentional and did not prejudice the rights of other parties, and the petitioner seeks to correct the error in good faith. *See, e.g., Horsehead Corp.—Pet. for Acquis. and Operation Exemption—Chestnut Ridge Ry.*, FD 34481 (STB served Mar. 12, 2004). Such relief is appropriate in this case, and TERRI respectfully requests that the STB grant the retroactive exemption sought herein. TERRI further respectfully requests expedited consideration of this Petition to facilitate the public benefits expected from TERRI’s imminent sale of the BC&G to the State for continued rail use. But for the oversight with regard to the 1995 merger, TERRI and the State would be able to avail themselves of the 30-day class exemption at 49 C.F.R. § 1150.41. However, the State cannot file the verified notice of exemption necessary to consummate the acquisition until this oversight is rectified. Regulatory review and approval of the merger is not necessary to carry out the transportation policy of 49 U.S.C. § 10101, this Petition is of limited scope and presents no adverse impacts to the public interest or shippers, and therefore, should be granted.

BACKGROUND

Mr. Bright, a noncarrier individual, is the sole owner of TERRI, a West Virginia corporation and Class III rail carrier created through the acquisition of a line previously owned and operated by CSX Transportation, Inc. between milepost (“MP”) 6.2, at or near Gilmer, and

MP 67.2, at or near Hartland, in Gilmer, Braxton, and Clay Counties, WV.¹ In 1992, the STB conditionally granted TERRI an exemption to reconstruct a previously abandoned 30-mile rail line that connects to TERRI's rail line at Hartland (MP 67.2) and extends to Falling Rock (MP 97.0) in Kanawha and Clay Counties, WV.² The exemption, as conditioned, became effective on September 15, 1996.³

Mr. Bright was also the sole owner and creator of BCR, a West Virginia corporation and Class III rail carrier created through, and for the purpose of, the acquisition of the BC&G.⁴ The BC&G is an 18-mile rail line extending from a junction point on TERRI's rail line at Dundon (MP 62.2 on TERRI's rail line; MP 0.0 on the BC&G) to Widen (MP 18.0) in Clay County, WV and was acquired by BCR in February 1992.⁵ The BC&G does not connect to any rail line other than TERRI's. Pursuant to 49 C.F.R. § 1013.1, before BCR's acquisition of the BC&G was consummated, Mr. Bright placed the entirety of his shares of BCR stock into an independent voting trust to avoid an unlawful common control violation, with the intent that after the

¹ See *The Elk River R.R., Inc.—Lease, Operation, and Acquis. Exemption—Line of CSX Transp., Inc.* (not printed), FD 31497 (ICC served July 26, 1989), 1989 WL 239035.

² *The Elk River R.R., Inc.—Construction and Operation Exemption—In Clay and Kanawha Counties, WV*, FD 31989 (ICC served May 28, 1992). Based on an environmental review of the proposal, the Board's Section of Environmental Analysis recommended a number of mitigation measures, which the Board then adopted and imposed as conditions on exemption.

³ See *The Elk River R.R., Inc.—Construction and Operation Exemption—In Clay and Kanawha Counties, WV*, FD 31989 (STB served Sept. 5, 1996).

⁴ *The Buffalo Creek R.R.—Acquis. and Operation Exemption—Buffalo Creek and Gauley R.R.* (not printed), FD 31968, 1992 WL 21150, at *1 n.1 (ICC served Feb. 11, 1992) (through the sale of BC&G's "line and all other operating assets to BCR," BC&G was relieved of its common carrier status, which was assumed by BCR) ("*BCR Acquisition Exemption*"); see also *William T. Bright—Control Exemption—The Buffalo Creek R.R.*, FD 31969, 1992 WL 41631 (ICC decided Mar. 3, 1992) ("*Control Exemption*").

⁵ *BCR Acquisition Exemption*, notice served and published in Fed. Reg. on Feb. 11, 1992.

transaction was consummated, and requisite ICC authority was secured, the trust would be dissolved and the BCR stock would be conveyed back to Mr. Bright.⁶

On November 15, 1991, Mr. Bright sought an exemption from the ICC from the prior approval requirements of 49 U.S.C. § 11343 (now, 49 U.S.C. § 11323) to authorize his acquisition of control over the BCR for the purpose of pursuing a coordinated rail rehabilitation and marketing effort to attract new traffic over both TERRI and the BC&G, as no traffic had moved over the connected rail lines for several years. In a decision served March 3, 1992, the ICC granted Mr. Bright's exemption request, finding that doing so would "encourage honest and efficient rail management and ensure the development of a sound and efficient transportation system," would not affect competition, and "may well present local shippers with the best chance for a resumption of service on the line," given the line's long-inactive status.⁷ Moreover, the ICC held the acquisition was limited in scope, due to the small size of BCR and the BC&G, and regulation was not necessary to protect shippers from the abuse of market power, as BCR was a "shortline attempting to reactivate eservice on an unused line in an area that is currently served by a single Class I railroad."⁸ Pursuant to the plan articulated to the ICC, Mr. Bright subsequently dissolved the voting trust and the BCR stock was conveyed back to him.

In December of 1995, BCR was merged with and into TERRI for largely the same purposes as previously articulated to the ICC in the *Control Exemption* proceeding – to achieve operating economies, improve service, enhance the financial viability of BC&G to avoid "eventual abandonment" of the line, and to eliminate unnecessary duplicity in coordinating the joint rehabilitation and marketing of the two connected railroads already held under common

⁶ *Control Exemption*, at *1.

⁷ *Id.* at *2.

⁸ *Id.*

control – and TERRI appropriately provided notice to, and filed the requisite Articles of Merger with, the West Virginia Secretary of State.⁹

Due to an inadvertent oversight and lack of knowledge that additional agency approval was necessary, TERRI never sought authorization from the ICC, or later, from the STB, for its merger as required under 49 U.S.C. §§ 11323-25. Had TERRI been aware of its obligation to obtain additional agency authorization, it would have timely filed a verified notice of exemption under 49 C.F.R. § 1180.2(d)(3) prior to consummating the merger. Indeed, the failure to seek prior authorization for the merger was in no way intended to flout the law, as TERRI only became aware of the need for such authorization as part of current Counsel's due diligence relating to the imminent and expected sale of the BC&G to the State. Upon learning of this oversight, TERRI promptly submitted this Petition to seek proper exemption.

REQUEST FOR EXEMPTION

Under 49 U.S.C. §§ 11323-25, the STB's approval and authorization are required for the merger of two rail carriers into one corporation for the ownership, management, and operation of the previously separately owned properties. However, under 49 U.S.C. § 10502(a), a transaction must be exempted from such requirements if the Board finds that: (1) the application of regulations to that transaction are not necessary to carry out the transportation policy of 49 U.S.C. § 10101; and (2) either (a) the transaction is of limited scope or (b) the requirement is not needed to protect shippers from the abuse of market power. The Board should grant TERRI's Petition for Exemption for precisely the same reasons previously articulated by the ICC in

⁹ TERRI filed Articles of Merger with the West Virginia Secretary of State on December 29, 1995, which are appended to hereto as **Exhibit 1**. A map depicting TERRI's lines and the BC&G in their true relation to each other, short line connections, other rail lines in the territory, and the principal geographic points in the region traversed is also appended hereto as **Exhibit 2**.

Control Exemption, as circumstances did not substantially change in the three years between 1992 when the ICC exempted Mr. Bright's acquisition of control of BCR and 1995 when BCR was merged with and into TERRI, and the ICC's reasoning remains equally applicable.

First, granting the Petition would further the Transportation Policy by minimizing the need for federal regulatory control over the rail transportation system and expediting the handling and resolution of this proceeding. *See* 49 U.S.C. §§ 10101(2), (15). Additionally, and as previously recognized in *Control Exemption*, due to the financial status of both railroads, the lack of traffic over the lines, and the common control over – and significant integration of – the railroads, authorizing the merger would further the Transportation Policy by ensuring the continuation of a sound rail transportation system with effective competition among rail carriers and other modes of transportation to meet the needs of the public, fostering sound economic conditions in transportation, encouraging honest and efficient management of railroads, and avoiding undue concentrations of market power. *See* 49 U.S.C. §§ 10101(4), (5), (9), and (12).

Second, as the ICC previously found, the transaction is limited in scope and does not implicate a need to protect shippers from the abuse of market power. Both the BCR and TERRI are Class III carriers, operating entirely within the State of West Virginia, and the BCR was a new shortline railroad attempting to reactivate service on an unused line served by a single Class I railroad. The BC&G is approximately 18 miles long, does not connect with another rail line other than TERRI's at Dundon, and has not carried any traffic in over twenty years.

Although the Board does not generally favor retroactive exemptions, the STB, and previously, the ICC, routinely grants such exemptions to legitimize transactions that would have been appropriate for exemption, had such relief been sought beforehand, where the petitioner has demonstrated: (1) its failure to seek timely authorization was inadvertent; (2) it notified the

Board promptly and in good faith upon discovering the non-compliance; and (3) the rights of other parties were not prejudiced as a result. *See, e.g., Horsehead Corp.—Pet. for Acquis. and Operation Exemption—Chestnut Ridge Ry.*, FD 34481 (STB served Mar. 12, 2004); *Iron Road Ry., et al.—Control Exemption—Bangor & Aroostook R.R., et al.*, FD 32982 (STB served Sept. 12, 1996). Such relief is warranted here.

Had TERRI realized its merger with BCR required prior agency approval, it could have filed a Notice of Exemption under 49 C.F.R. § 1180.2(d)(3), or a Petition for Exemption under 49 U.S.C. § 10502, and the transaction would likely have been exempt, as the ICC and the Board have previously found that regulation of such limited transactions, particularly between corporate families, are unnecessary. *See, e.g., Nebraska Northwestern R.R. and Nebkota Ry.—Intra-Corporate Family Transaction Exemption*, FD 36097 (STB served Apr. 19, 2017). TERRI's failure to file such a Notice was unintentional and inadvertent. Indeed, the ICC was aware when granting Mr. Bright exemption for authority of common control over TERRI and BCR that Mr. Bright's intention was to manage the two railroads together to improve efficiencies and attempt to attract traffic to the inactive, connected rail lines. Mr. Bright also explained to the ICC that the financial futures and continued viability of the two railroads were dependent upon one another's success. *Cf. Gen. Ry. Corp., d/b/a Iowa Nw. R.R.—Exemption for Acquis. of R.R. Line—in Osceola & Dickinson Ctys., IA*, FD 34867, 2007 WL 1723364, at *4 (June 13, 2007) (language in prior exemption notice about the transfer of ownership suggested the later failure to obtain acquisition authority was an oversight). It was only through due diligence conducted in anticipation of the sale of the BC&G to the State that Counsel discovered TERRI's oversight. Upon learning of the mistake, TERRI promptly filed this Petition to resolve its previous error. TERRI's unintentional delay in bringing this matter has not prejudiced any other parties, as there

are no active shippers on the line, and freight traffic has not moved over the BC&G in over twenty years. Thus, retroactive exemption to authorize the merger of the BCR with and into TERRI is clearly appropriate in this case.

CONCLUSION

TERRI sincerely regrets its previous oversight and apologizes to the Board for its inadvertent failure to seek and obtain authorization prior to the merger of the BCR with and into TERRI. For the foregoing reasons, TERRI respectfully requests that the Board expeditiously grant TERRI's *nunc pro tunc* Petition for Exemption from the requirements of 49 U.S.C. §§ 11323-25, pursuant to 49 U.S.C. § 10502.

Respectfully submitted,

By: 
Frank N. Jorgensen, President
The Elk River Railroad, Inc.
200 Greenbriar Road
P.O. Box 460
Summerville, WV 26651

Of Counsel:

SLOVER & LOFTUS LLP
1224 Seventeenth Street, N.W.
Washington, D.C. 20036

Dated: August 27, 2020

William L. Slover
A. Rebecca Williams
SLOVER & LOFTUS LLP
1224 Seventeenth Street, N.W.
Washington, D.C. 20036
(202) 347-7170

Attorneys for Petitioner The Elk River
Railroad, Inc.

VERIFICATION

I, Frank N. Jorgensen, individually and as President of The Elk River Railroad, Inc.,
verify under penalty of perjury that the foregoing is true and correct. Further, I certify that I am
qualified and authorized to file the foregoing document.

Executed on August 27, 2020.



Frank N. Jorgensen
President, The Elk River Railroad, Inc.

EXHIBIT 1

ARTICLES OF MERGER
OF
THE BUFFALO CREEK RAILROAD COMPANY
INTO
THE ELK RIVER RAILROAD, INC.

FILED
DEC 29 1995
IN THE OFFICE OF
SECRETARY OF STATE
WEST VIRGINIA

Pursuant to the provisions of W.Va. Code § 31-1-36, The Elk River Railroad, Inc. and The Buffalo Creek Railroad Company, both of which are corporations organized under the laws of the State of West Virginia, adopt the following Articles of Merger for the purpose of merging The Buffalo Creek Railroad Company into The Elk River Railroad, Inc. with The Elk River Railroad, Inc. as the surviving corporation.

FIRST: The following Plan of Merger was approved by the shareholders of each corporation effective as of December 31, 1995, pursuant to W.Va. Code § 31-1-117:

PLAN OF MERGER

1. Scope of Plan. This Plan of Merger (the "Plan") provides for the merger of The Buffalo Creek Railroad Company, a West Virginia corporation ("Buffalo Creek"), into The Elk River Railroad, Inc. ("Elk River"), a West Virginia corporation, pursuant to W.Va. Code § 31-1-34. The merger of Buffalo Creek into Elk River shall be accomplished in the manner stated in this Plan.

2. Adoption of Plan. The Plan shall be adopted and become effective upon the recommendation and adoption of the Plan by the Boards of Directors of Buffalo Creek and Elk River and the approval of a majority of the shareholders of each corporation.

3. The Merger. Elk River and Buffalo Creek shall be merged into Elk River as provided herein (the "Merger"). The Merger shall be effective as of December 31, 1995, ("Effective Date"). Thereupon, the corporate existence of Elk River, with all the purposes, powers and objects of Elk River, shall continue unaffected and unimpaired by the Merger, and the corporate identity and existence of Buffalo Creek, with all the purposes, powers and objects of Buffalo Creek, shall be merged into Elk River, and Elk River, as the corporation surviving the Merger (sometimes herein referred to as the "Surviving Corporation"), shall be fully vested

therewith. The separate existence and corporate organization of Buffalo Creek shall cease as of the effective date.

4. Articles of Incorporation. No changes shall be made in the Articles of Incorporation of Elk River. As of the Effective Date, the Articles of Incorporation of the Surviving Corporation shall be in the form of the existing Articles of Incorporation of Elk River, and, as mended from time to time as provided by law separate and apart from this Agreement, shall be, and may be separately certified as, the Articles of Incorporation of the Surviving Corporation.

5. Bylaws. As of the Effective Date, the Bylaws of the Surviving Corporation shall be in the form of the existing Bylaws of Elk River. From and after the Effective Date, the same may be altered, amended or repealed in accordance with law, the Articles of Incorporation of the Surviving Corporation, or said Bylaws.

6. Directors and Officers. As of the Effective Date, the members of the Board of Directors and officers of the Surviving Corporation shall be the same as those of Elk River immediately prior to the Effective Date.

7. Conversion of Shares. As of the Effective Date, the issued and outstanding shares of the capital stock of Buffalo Creek shall be surrendered and cancelled, and the shareholders of Buffalo Creek shall receive no shares of stock of Elk River pursuant to the Merger. The outstanding stock of Elk River will not be affected by the Merger.

8. Effect of the Merger. At and after the Effective Date, the Surviving Corporation shall possess all the rights, privileges, immunities, powers, and purposes of each of Elk River and Buffalo Creek; all the property, real and personal, including subscriptions to shares, causes of actions and every other asset of Elk River and Buffalo Creek shall vest in Elk River as the Surviving Corporation without further action or deed; and Elk River as the Surviving Corporation shall assume and be liable for all the liabilities, obligations and penalties of Elk River and Buffalo Creek. No demand for any director thereof, shall be released or impaired by the Merger, and no action or proceeding, whether civil or criminal, then pending by or against Elk River and Buffalo Creek, or any shareholder, officer or director thereof, shall abate or be discontinued by the Merger, but may be enforced, prosecuted, settled or comprised as if the Merger has not occurred, or the Surviving Corporation may be substituted in any such action or special proceeding in place of Elk River or Buffalo Creek.

9. Further Assurances. If, at any time after the Effective Date, the Surviving Corporation shall consider or be advised that any further deeds, assignments or assurances in law of in any other things are necessary, desirable or proper to vest,

perfect or confirm, or record or otherwise, in the Surviving Corporation, the title to any property rights of Elk River or Buffalo Creek acquired or to be acquired by reason of, or as the result of, the Merger, Elk River and Buffalo Creek and their proper officers and directors shall and will execute and deliver all such proper deeds, assignments, and assurances in law and do all things necessary, desirable or proper to vest, perfect or confirm title to such property or rights in the Surviving Corporation and otherwise to carry out the purpose of this Plan, and the proper officers and directors of Elk River and Buffalo Creek and the proper officers and directors of the Surviving Corporation are fully authorized in the name of Elk River and Buffalo Creek, the Surviving Corporation or otherwise to take any and all such action.

10. Authorization. The officers of Elk River and Buffalo Creek are authorized to take any and all action, including the execution of any document, which may be necessary or appropriate to carry out the Plan.

SECOND: No shares of stock of each corporation are entitled to vote as a class. The number of outstanding shares of each class of stock of each corporation are as follows:

<u>Name of Designation Corporation</u>	<u>Number of Shares Outstanding</u>	<u>Class</u>
The Elk River Railroad, Inc.	100	Common
The Buffalo Creek Railroad Company	10	Common

and the number of shares of stock of each corporation voting in favor of the Plan of Merger (which vote in the case of each corporation was by agreement in lieu of meeting) are as follows:

<u>Name of Corporation</u>	<u>Number of Shares Voted For</u>	<u>Voted Against</u>
The Elk River Railroad, Inc.	100	0
The Buffalo Creek Railroad Company	10	0

DATED effective as of the 26th day of December, 1995.

THE ELK RIVER RAILROAD, INC.

By 
Frank N. Jorgensen

By 
James E. Davis

THE BUFFALO CREEK RAILROAD
COMPANY

By 
William T. Bright

By 
James E. Davis

ABB0B0FD|122695

BOOK 0367 PAGE 769

STATE OF WEST VIRGINIA,

COUNTY OF NICHOLAS, to-wit:

BOOK 0367 PAGE 770

The foregoing instrument was acknowledged before me this 27th day of December, 1995, by Frank N. Jorgensen, President of The Elk River Railroad, Inc., a West Virginia corporation, on behalf of said Corporation.

My commission expires September 20, 2005.



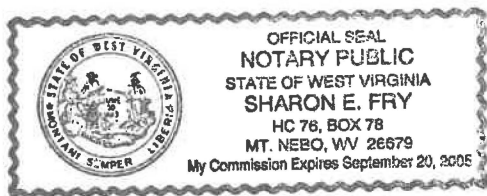
Sharon E. Fry
Notary Public

STATE OF WEST VIRGINIA,

COUNTY OF NICHOLAS, to-wit:

The foregoing instrument was acknowledged before me this 27th day of December, 1995, by James E. Davis, Secretary of The Elk River Railroad, Inc., a West Virginia corporation, on behalf of said Corporation.

My commission expires September 20, 2005.

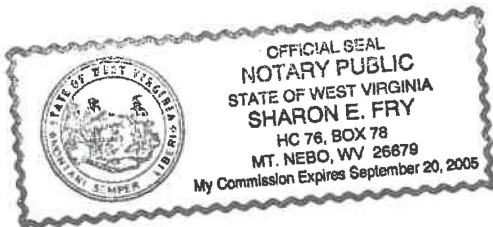


Sharon E. Fry
Notary Public

STATE OF WEST VIRGINIA,
COUNTY OF NICHOLAS, to-wit:

The foregoing instrument was acknowledged before me this
27th day of December, 1995, by William T. Bright, President of The
Buffalo Creek Railroad Company, a West Virginia corporation, on
behalf of said Corporation.

My commission expires September 20, 2005.

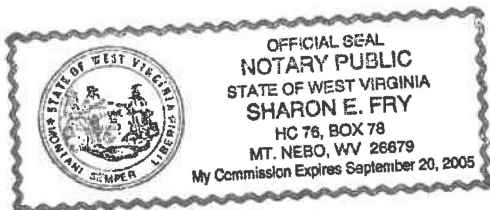


Sharon E. Fry
Notary Public

STATE OF WEST VIRGINIA,
COUNTY OF NICHOLAS, to-wit:

The foregoing instrument was acknowledged before me this
27th day of December, 1995, by James E. Davis, Secretary of The
Buffalo Creek Railroad Company, a West Virginia corporation, on
behalf of said Corporation.

My commission expires September 20, 2005.



Sharon E. Fry
Notary Public

STATE OF WEST VIRGINIA

Nicholas County Commission Office 1/16 1996

This Cert. of Inc. was this day pre-
in said office and thereon together w
attestate thereto as follows is admitted to r

-6-

BOOK 0367 PAGE 771

Tests John Sheaf Clerk

EXHIBIT 2

AREA RAILROADS

1) NSC

Norfolk Southern
(last train to Blue Creek 1990)
(last train to Falling Rock 1982)

2) TERRI ROW

Tracks and Bridge Steel removed 1981.

3) BC&G

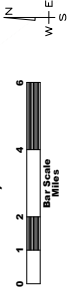
Significant flood damage June 2016.
(last train entire BC&G 1963)
(last train end section 1999)

4) TERRI

(NORTH)
(last train 1999)

5) TERRI

(SOUTH)
(last train 1999)



Plot Date: May 17, 2017

