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VIA E-FILING

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

Re: Docket No. FD 35068, *Soo Line Railroad Company d/b/a Canadian Pacific Railway—Acquisition and Operation Exemption—BNSF Railway Company*

Dear Ms. Brown:

BNSF Railway Company (“BNSF”) hereby replies to the letter submitted in the above-referenced Surface Transportation Board (“Board”) proceeding on behalf of the City of Minot (“City”), dated May 24, 2021.

In its letter, the City expressed concerns regarding the service proposal set forth in BNSF’s filing on March 1, 2021, whereby BNSF and Soo Line Railroad Company d/b/a Canadian Pacific Railway (“CP”) would expand the existing BNSF/CP haulage arrangement to allow for the interchange in Minot of unit trains bound to/from New Century Ag (“NCA”), in addition to the manifest traffic that the two carriers interchange there today.

Upon receipt of the City’s letter, BNSF re-analyzed the feasibility and potential impacts of the BNSF service proposal. BNSF offered multiple times to meet with the City to again address its concerns and explore potential solutions. Because the City didn’t pursue another meeting, BNSF is responding to their concerns and setting forth its analysis in this letter.

BNSF appreciates the City’s perspective and understands its concerns regarding potential disruption to the community resulting from these proposed unit

train interchange movements. BNSF and CP have safely and efficiently interchanged manifest traffic in Minot for more than a decade, and BNSF remains confident that it can similarly conduct an interchange of unit trains in Minot with minimal disruption to the community.

Indeed, BNSF continues to believe that its service proposal presents the most efficient, cost-effective, and timely means by which to provide the unit train service requested by NCA. BNSF explained in its proposal that BNSF would take several steps to make this interchange practicable and safe, including prioritizing dispatching of the movement, utilizing locomotives at both ends of the train, providing van service to crew members on the ground, and holding the train in BNSF's yard if a direct hand-off is not available. BNSF's proposal further notes that the interchange would be infrequent, occurring only one or two times per month.

In addition to these efforts, BNSF proposes to further address the City's concerns by designing and implementing a service plan that would allow for interchange with CP to occur in the overnight hours, after midnight. Restricting service to overnight hours should help to limit the impacts of the train movements on the community of Minot.

BNSF welcomes the opportunity to discuss this matter with the City in further detail. Please contact me if you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter W. Denton', with a stylized flourish at the end.

Peter W. Denton
Attorney for BNSF Railway Company

cc: All parties of record
Adrian L. Steel, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2021, I served the forgoing letter by electronic mail on all parties of record on the service list.

A handwritten signature in black ink, appearing to read 'Peter W. Denton', with a horizontal line extending to the right.

Peter W. Denton
Attorney for BNSF Railway Company