

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
September 20, 2022
Part of
Public Record

DOCKET NO. FD 36616

**SAVAGE TOOEELE RAILROAD COMPANY – CONSTRUCTION AND OPERATION
EXEMPTION – LINE OF RAILROAD IN TOOEELE COUNTY, UTAH**

VERIFIED SUPPLEMENT

Petitioner, Savage Tooele Railroad Company (“STR”), hereby submits this Verified Supplement to its Petition for Exemption in response to the decision served in this proceeding by the Director of the Office of Proceedings on August 24, 2022. That decision directed STR to clarify:

- Whether STR will (a) purchase the right-of-way and track between milepost 0.0 and milepost 1.04 and reinstate common carrier service over it, or (b) obtain operating rights over that track and amend its petition to seek authority for such operations.
- Alternatively, whether that track will become part of UP’s mainline and UP will obtain authority to operate over it.¹

As directed by the Board, STR states that on September 14, 2022, counsel for Union Pacific Railroad Company (“UP”) informed counsel for STR that UP has decided to retain ownership of its abandoned right-of-way between milepost 0.0 and milepost 1.04, and to petition the Board to reinstate common carrier operating authority over this segment. Under this scenario, “STR’s proposed line [would] connect (and remain connected) to the national rail network”² by

¹ Decision at 2.

² *Id.*

interchanging cars and trains with UP at milepost 1.04. If further discussions between the parties result in establishing STR's connection to the national network through acquisition of the right-of-way and track between milepost 0.0 to milepost 1.04, or obtaining operating rights over this track, STR will so advise the Board and amend its Petition for Exemption accordingly.

Respectfully submitted,



Thomas W. Wilcox
Law Office of Thomas W. Wilcox, LLC
1629 K. Street, NW
Suite 300
Washington, D.C. 20006
(202) 508-1065
tom@twilcoxlaw.com

Attorney for Savage Tooele Railroad Company

September 20, 2022

VERIFICATION

I, Phillip Hoskins, Senior Director of Business Development for Savage Services, an affiliate of Savage Tooele Railroad, declare under penalty of perjury that the facts set forth in the foregoing Verified Supplement are true and correct. Further, I certify that I am qualified and authorized to execute this verification on behalf of Savage Toole Railroad

Executed: September 20, 2022

A handwritten signature in black ink, reading "Phillip Hoskins", written over a horizontal line.

Phillip Hoskins

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of September 2022, I served a copy of the foregoing Verified Supplement mail upon all parties of record on the official service list for Docket No. FD 36616

/ss/ Thomas W. Wilcox
