

From: [Wood, Diana](#)
To: [Whitfield, Peter](#)
Cc: [Thornhill, Steve](#); [Hildebrandt, Brooklyn](#)
Subject: RE: CN question on train number increase on one line segment
Date: Monday, October 3, 2022 7:35:04 AM

Peter,

In addition to the question below, we need to know if the Blackburn siding, which is being relocated, would be removed or remain in place. If it remains, will it be used for car storage or other? Also, please confirm that all the siding improvements are for passings, not car storage or other activities.

Thanks,
Diana

From: Wood, Diana <Diana.Wood@stb.gov>
Sent: Wednesday, September 28, 2022 2:38 PM
To: Whitfield, Peter <pwhitfield@sidley.com>
Cc: Thornhill, Steve <sthornh@burnsmcd.com>; Hildebrandt, Brooklyn <bhildebrandt@sidley.com>; Gosselin, Danielle <Danielle.Gosselin@stb.gov>; Wayland, Joshua <Joshua.Wayland@stb.gov>
Subject: RE: CN question on train number increase on one line segment

Peter,

Thanks for providing these details. However, in looking at the information in closer detail, including CN's amended responsive application and operating plan, Steve and I have not been able to figure out how the 2.6 mile trackage rights segment between the KCS Springfield node (MP 192.4) and the CN Brickyard Junction node (MP 194.8) is captured and represented. According to page 470, CN currently accesses this 2.6 mile segment via "trackage rights over NS-owned track as a sub-tenant of UP" to get to and from the Springfield line. Please confirm whether CN uses this segment solely as a "bridge" to connect the CN and KCS lines, and explain how this segment has been/should be/needs to be captured in data and maps – whether it be its own segment, or included with Brickyard, or not included at all. In any event, we'll need to include and evaluate CN transaction-related increases in this 2.6 mile segment moving forward.

Thanks,
Diana

From: Whitfield, Peter <pwhitfield@sidley.com>
Sent: Tuesday, September 27, 2022 5:39 PM
To: Wood, Diana <Diana.Wood@stb.gov>
Cc: Thornhill, Steve <sthornh@burnsmcd.com>; Hildebrandt, Brooklyn <bhildebrandt@sidley.com>; Gosselin, Danielle <Danielle.Gosselin@stb.gov>; Wayland, Joshua <Joshua.Wayland@stb.gov>
Subject: RE: CN question on train number increase on one line segment

Diana,

Pursuant to its Responsive Application in Docket No. FD 36500 (Sub-No. 1), CN proposes to acquire approximately 370.3 route miles of KCS rail line, as follows:

- From MP 192.4 at Springfield (Cockrell), Illinois to MP 480.0 at Rock Creek Jct. in Kansas City, Missouri [milepost equation at Murrayville, Illinois, where MP 221.7=MP 226.7], a distance of approximately 284.6 miles.
- From MP 68.2 at Roodhouse, Illinois (MP 237.2 on the first segment) to MP 287.2 at Church, East St. Louis, Illinois [milepost equation at Godfrey, Illinois, where MP 28.0=MP 252.1], a distance of approximately 75.3 miles.
- From MP 226.7 at Murrayville, Illinois to MP 216.3 at Jacksonville, Illinois, a distance of approximately 10.4 miles.

CN also would acquire KCS's lessor interest in the Fulton Branch from MP 0.0 to MP 3.0 at Mexico, Missouri, which is leased to Ozark Valley Railroad, Inc.

The rail line between Godfrey, Illinois and Church, East St. Louis, Illinois is jointly-owned by KCS and Union Pacific Railroad Company.

These route miles to be acquired differ from the 409.3 miles shown in the Excel spreadsheet previously provided primarily because:

- (1) the spreadsheet includes the proposed CN trackage rights over KCS from Rock Creek Jct. to IFG;
- (2) the spreadsheet uses a western terminus milepost further into the Kansas City terminal than Rock Creek Jct.; and
- (3) the spreadsheet does not account for the milepost equation at Murrayville. There also are much smaller inconsistencies involving the complex trackage in East St. Louis. In some instances these differences reflect the particular line segments that CP/KCS had defined in its submissions, or line segments as they are presented in the Multirail program.

Regarding the materials in the word document, your highlighted text regarding the Murrayville-Springfield segment of the line is exactly correct.

Please let us know if there are further questions that we can address.

PETER WHITFIELD

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From: Wood, Diana <Diana.Wood@stb.gov>
Sent: Monday, September 26, 2022 7:48 AM
To: Whitfield, Peter <pwhitfield@sidley.com>
Cc: Thornhill, Steve <sthornh@burnsmcd.com>; Hildebrandt, Brooklyn <bhildebrandt@sidley.com>; Gosselin, Danielle <Danielle.Gosselin@stb.gov>; Wayland, Joshua <Joshua.Wayland@stb.gov>
Subject: RE: CN question on train number increase on one line segment

Peter,

Also, could you confirm the total mileage in the Sub-No 1 docket? The Excel spreadsheet shows the total as 409.8 miles but some of that is trackage rights and not part of the sub-docket in the environmental review.

Thanks,
Diana

From: Wood, Diana <Diana.Wood@stb.gov>
Sent: Monday, September 26, 2022 7:10 AM
To: Whitfield, Peter <pwhitfield@sidley.com>
Cc: Thornhill, Steve <sthornh@burnsmcd.com>; Hildebrandt, Brooklyn <bhildebrandt@sidley.com>; Gosselin, Danielle <Danielle.Gosselin@stb.gov>; Wayland, Joshua <Joshua.Wayland@stb.gov>
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Thanks for clarifying Peter. Could you please look at the attached list and provide the updated information to the two highlighted line segments as it should appear (as amended). I want to make absolutely sure we have the correct information moving forward, and that it's accurately represented in the forthcoming maps and consultation letters.

Thanks,
Diana

From: Whitfield, Peter <pwhitfield@sidley.com>
Sent: Thursday, September 22, 2022 6:17 PM
To: Wood, Diana <Diana.Wood@stb.gov>
Cc: Thornhill, Steve <sthornh@burnsmcd.com>; Hildebrandt, Brooklyn <bhildebrandt@sidley.com>
Subject: RE: CN question on train number increase on one line segment

Diana,

The issue was as expected – one that was geography based. We apologize for not

making the issue regarding the Cockrell location clearer in our filing and we are submitting a revised spreadsheet that should help.

The issue arises from an error in the Primary Applicants' initial description of the east end of the Springfield Line. That description indicated that the line extended from Murrayville to Springfield, and then from Springfield to Cockrell. In reality, however, the line extends from Murrayville through Cockrell and on to Springfield.

We attempted to clarify this at pages 2-4 of its CN's September 6, 2022 submission, with a description of the issue on page 3. It is also why Line 4 of the Attachment 2 spreadsheet to that submission (designated as "Springfield IL – Cockrell IL") contains no data – that segment is subsumed within the "Murrayville IL – Springfield IL" segment on Line 3.

The first tab of CN's earlier July 7, 2022 spreadsheet, however, confusingly included partial data on Line 12, the "Springfield (Other)" segment from Springfield to Cockrell, even though that segment was likewise already covered by Line 11, the "Murrayville, IL – Springfield, IL" segment. That spreadsheet also gave an incorrect mileage under "CN Considered Mileage" for the Murrayville-Springfield segment on Line 11 (cell L11). The attached revised spreadsheet corrects these items, with revised information indicated by yellow highlighting.

Finally, we note that there is a milepost equation on the Springfield Line at Murrayville, where $MP\ 221.7 = MP\ 226.7$. This is why Lines 10 and 11 of the July 7, 2022 spreadsheet appear to show a five-mile gap at Murrayville (compare cells G10 and G11).

We hope this explanation addresses your question. We are available at your convenience to discuss these matters further if that would be helpful. Thank you.

PETER WHITFIELD

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From: Wood, Diana <Diana.Wood@stb.gov>

Sent: Monday, September 19, 2022 2:18 PM

To: Whitfield, Peter <pwhitfield@sidley.com>

Cc: Thornhill, Steve <sthornh@burnsmcd.com>

Subject: RE: CN question on train number increase on one line segment

And it's also missing in spreadsheet 1 from your responses to

Information Request 1.

From: Wood, Diana <Diana.Wood@stb.gov>

Sent: Monday, September 19, 2022 2:11 PM

To: Whitfield, Peter <pwhitfield@sidley.com>

Cc: Thornhill, Steve <sthornh@burnsmcd.com>

Subject: CN question on train number increase on one line segment

Peter,

In the 7-7-2022 Excel spreadsheet you submitted, the 2027 increase in the number of CN trains per day is missing for the 10.3 mile segment between Cockrell and Springfield, and the updated map is also not clear. But the 540% GMT increase shown in the spreadsheet clearly shows that this line segment is above OEA thresholds for analysis (as you have confirmed in your response to Info Request #1).

Hoping you can provide that one piece of missing information.

Thanks,
Diana

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