

1330 Connecticut Avenue, NW  
Washington, DC 20036-1795  
202 429 3000 main  
www.steptoe.com

January 5, 2024

**VIA ELECTRONIC MAIL**

Danielle Gosselin  
Director, Office of Environmental Analysis  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423

**Re: STB Docket No. FD 36727, CSX Transportation, Inc.—Acquisition and Operation—Rail Line of Meridian & Bigbee Railroad, L.L.C.**

Dear Ms. Gosselin:

On December 21, 2023, the Board's<sup>1</sup> OEA issued Information Request No. 1 in the above-referenced proceeding. OEA requested responses no later than January 5, 2024.

CSXT is hereby submitting its response to Information Request No. 1. CSXT's response is limited to the Eastern Line that is the subject of the CSXT Application, and CSXT's response does not discuss operations on the Western Line that is the subject of the CPKC Application. CSXT understands that CPKC is concurrently submitting a response to Information Request No. 1.

**CSXT's Response to Information Request No. 1**

- 1. Provide the following information on rail traffic where transaction-related traffic would exceed the Board's thresholds at 49 C.F.R. § 1105.7(e)(5) (with traffic levels based on projections five years after the date of the anticipated year of the issuance of a final decision from the Board):*
  - A. For all Meridian & Bigbee Railroad (MNBR) rail segments between Meridian, Mississippi and Burkville, Alabama, provide the milepost endpoints for operation of local trains pre- and post-transactions.*

---

<sup>1</sup> The acronyms and defined terms used in this Response are the same as those used in CSXT's Application or in Decision No. 1 in Docket No. FD 36727, served by the Board on November 3, 2023.

Set forth below are the milepost endpoints for operation of trains on the Eastern Line and the Burkeville-Montgomery segment pre- and post-transactions.

**Pre-Transaction.** As described in the CSXT Operating Plan, MNBR currently operates two road trains over the Eastern Line and the Burkeville-Montgomery segment, and AGR operates one road train in each direction over the Eastern Line.

| <b>Train</b> | <b>Route (including milepost endpoints)</b>                                                                                                                                                 |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| L125         | Selma (MP 110.5) – Whitehall (MP 134.0) – Burkeville (MP 144.3) – Montgomery (CSXT MP 000489 for S and N Yard or CSXT MP XXB174 for Chester Yard)                                           |
| L126         | Montgomery (CSXT MP 000489 for S and N Yard or CSXT MP XXB174 for Chester Yard) – Burkeville (MP 144.3) – Whitehall (MP 134.0) – Selma (MP 110.5) – Myrtlewood (MP 49.0) – Selma (MP 110.5) |
| AGR          | Linden (MP 59.9) – Myrtlewood (MP 49.0)                                                                                                                                                     |
| AGR          | Myrtlewood (MP 49.0) – Linden (MP 59.9)                                                                                                                                                     |

**Post-Transaction.** CSXT anticipates that the following CSXT trains will operate over the Eastern Line and the Burkeville-Montgomery segment post-transaction: a westbound road train, an eastbound road train, a local Selma train, and a local Montgomery train.

| <b>Train</b>                | <b>Route (including milepost endpoints)</b>                                                                         |
|-----------------------------|---------------------------------------------------------------------------------------------------------------------|
| CSXT Westbound road train   | Montgomery (CSXT MP 000489 for S and N Yard) – Selma (MP 110.5) – Burkeville (MP 144.3) – Myrtlewood (MP 49.0)      |
| CSXT Eastbound road train   | Myrtlewood (MP 49.0) – Burkeville (MP 144.3) – Selma (MP 110.5) – Montgomery (CSXT MP 000489 for S and N Yard)      |
| CSXT local Selma train      | Starts and ends in Selma (MP 110.5)                                                                                 |
| CSXT local Montgomery train | Montgomery (CSXT MP 000489 for S and N Yard) – Burkeville (MP 144.3) – Montgomery (CSXT MP 000489 for S and N Yard) |

CSXT anticipates that the following AGR trains will operate over the Eastern Line post-transaction, much as they do today: a westbound road train and an eastbound road train.

| <b>Train</b>             | <b>Route (including milepost endpoints)</b> |
|--------------------------|---------------------------------------------|
| AGR Westbound road train | Linden (MP 59.9) – Myrtlewood (MP 49.0)     |
| AGR Eastbound road train | Myrtlewood (MP 49.0) – Linden (MP 59.9)     |

*B. Provide segment lengths and milepost endpoints for each rail segment between Meridian, Mississippi and Burkville, Alabama.*

Set forth below are mileposts, stations, and segment lengths for each rail segment between Myrtlewood, AL and Burkeville, AL, along with the Burkeville-Montgomery segment.

| <b>Segment</b>             | <b>Begin MP</b> | <b>End MP</b>  | <b>Length (Miles)</b> |
|----------------------------|-----------------|----------------|-----------------------|
| Myrtlewood – Linden        | 49.6            | 59.9           | 10.3                  |
| Linden – Selma             | 59.9            | 110.5          | 50.6                  |
| Selma – Whitehall          | 110.5           | 134.0          | 23.5                  |
| Whitehall –<br>Burkeville  | 134.0           | 144.3          | 10.3                  |
| Burkeville –<br>Montgomery | 144.3           | CSXT MP 000489 | 14.1                  |

*C. Provide estimates of the average number of locomotives per train, the average number of railcars per train, and the average total length (in feet) of trains pre- and post-transactions.*

As stated above, CSXT anticipates that the following CSXT trains will operate over the Eastern Line and the Burkeville-Montgomery segment post-transaction: a westbound road train, an eastbound road train, a local Selma train, and a local Montgomery train. CSXT also anticipates that the following AGR trains will operate over the Eastern Line post-transaction: a westbound road train and an eastbound road train. CSXT's operating plan contemplates CSXT-CPKC run-through power with each railroad providing half of the locomotives. Set out below are CSXT's estimates of the relevant metrics. Different estimates are provided for the CSXT road trains west and east of Selma because, as described in the CSXT Operating Plan submitted with the CSXT Application, the CSXT road trains will set off and pick up cars at Selma.

| Operation                                    | Locomotives Per Train | Railcars Per Train | Average Train Length |
|----------------------------------------------|-----------------------|--------------------|----------------------|
| <b>Pre-Transaction</b>                       |                       |                    |                      |
| MNBR                                         | 3                     | 85                 | 5400'                |
| AGR                                          | 2                     | 60                 | 4000'                |
| CSXT Local Montgomery Train                  | 2                     | 12                 | 760'                 |
| <b>Post-Transaction</b>                      |                       |                    |                      |
| AGR                                          | 2                     | 60                 | 4000'                |
| CSXT Eastbound Road Train (Myrtlewood-Selma) | 2                     | 106                | 7678'                |
| CSXT Eastbound Road Train (Selma-Montgomery) | 2                     | 121                | 8530'                |
| CSXT Westbound Road Train (Montgomery-Selma) | 2                     | 121                | 8530'                |
| CSXT Westbound Road Train (Selma-Myrtlewood) | 2                     | 106                | 7678'                |
| CSXT Local Selma Train                       | 2                     | 30                 | 2098'                |
| CSXT Local Montgomery Train                  | 2                     | 22                 | 1270'                |

*D. Provide estimates of the average length of locomotives and average rail car length pre- and post-transactions.*

Generally, the length of different types of assets are not expected to change pre- and post-transaction.

| Asset Type             | Representative Length | Representative Type   |
|------------------------|-----------------------|-----------------------|
| MNBR Locomotive        | 69'                   | SD 40                 |
| AGR Locomotive         | 72'                   | Dash 8                |
| CSXT 6-Axle Locomotive | 74'                   | AC 4400               |
| Intermodal 5-Well Car  | 270'                  | TTX Intermodal Car    |
| Intermodal 3-Well Car  | 205'                  | TTX Intermodal Car    |
| Auto Rack              | 94'                   | Standard Auto Carrier |
| Box Car                | 65'                   | Standard Box Car      |
| Tank Car               | 65'                   | Standard DOT 111 Tank |

*E. Provide the proportion of locomotives in each US Environmental Protection Agency emissions tier fleetwide (Uncontrolled, 0, 0+, 1, 1+, 2, 2+, 3 and 4) pre- and post-transactions.*

**Pre-Transaction.** The table below provides the current proportion of locomotives in each US EPA emissions tier fleetwide for MNBR, AGR, and CSXT. MNBR and AGR include all active locomotives.

| Railroad | Percentage of Respective Fleet in Each EPA Emissions Tier |    |    |     |   |    |     |   |    |   |     |    |          | Total |
|----------|-----------------------------------------------------------|----|----|-----|---|----|-----|---|----|---|-----|----|----------|-------|
|          | N/A                                                       | 0  | 0+ | 0+C | 1 | 1+ | 1+C | 2 | 2+ | 3 | 3+C | 4  | 4 Credit |       |
| MNBR     | 38                                                        | 46 | 16 |     |   |    |     |   |    |   |     |    |          | 100   |
| AGR      |                                                           | 25 | 25 | 13  |   | 37 |     |   |    |   |     |    |          | 100   |
| CSXT     |                                                           | 5  | 2  |     | 1 | 35 |     |   | 32 | 9 |     | 12 | 4        | 100   |

**Post-Transaction.** The proportion of locomotives in each EPA Emissions Tier is not expected to materially change post-transaction. CSXT expects that 19 CSXT locomotives in Tier 1 will move to Tier 1+ by 2029.

*F. Provide anticipated fleet-wide locomotive fuel efficiency factor in gross ton miles per gallon of fuel pre-and post-transactions.*

**Pre-Transaction.** In 2022, CSXT's fleet-wide locomotive fuel efficiency factor was 1027 in gross ton miles per gallon of fuel. MNBR's pre-transaction fuel efficiency was 438 GTMs/gallon.<sup>2</sup>

---

<sup>2</sup> MNBR fuel efficiency was calculated using communicated fuel burn (44,000 gallons per month) and estimated 2022 GTMs from the CPKC and CSXT applications.

**Post-Transaction.** CSXT anticipates a moderate gain in efficiency post-transaction. CSXT estimates that its fleet-wide locomotive fuel efficiency factor will be 1036 in gross ton miles per gallon of fuel five-years post transaction (2029). MNBR will not operate on the Eastern Line post-transaction.

*G. Provide average train speed on each MNBR rail line segment pre- and post-transactions.*

**Pre-Transaction.** The list below summarizes current maximum authorized speeds and permanent speed restrictions on the Eastern Line.

- MP 49.0 to MP 59.0: 10 mph
- MP 59.0 to MP 62.0: 25 mph
- MP 62.0 to MP 69.0: 10 mph
- MP 69.0 to MP 80.0: 25 mph
- MP 80.0 to MP 85.0: 10 mph
- MP 85.0 to MP 89.2: 25 mph
- MP 89.2 to MP 89.4: 10 mph
- MP 89.4 to MP 92.5: 25 mph
- MP 92.5 to MP 92.7: 10 mph
- MP 92.7 to MP 101.0: 25 mph
- MP 101.0 to MP 104.0: 10 mph
- MP 104.0 to MP 109.0: 25 mph
- MP 109.0 to MP 116.0: 10 mph
- MP 116.0 to MP 126.0: 25 mph
- MP 126.0 to MP 128.0: 10 mph
- MP 128.0 to MP 142.0: 25 mph
- MP 142.0 to MP 144.3: 10 mph

Additionally, the following other permanent speed restrictions currently apply on the Eastern Line:

Meridian Subdivision (Myrtlewood Station to Thomaston Station):

|                                 |        |
|---------------------------------|--------|
| Through turnouts and crossovers | 10 MPH |
| MP 46.3 Tombigbee River Bridge  | 10 MPH |
| Myrtlewood Auxiliary Track      | 10 MPH |
| Other Than Main Track           | 10 MPH |

Selma Subdivision: (Thomaston Station to Burkeville Station):

|                                  |        |
|----------------------------------|--------|
| Through turnouts and crossovers  | 10 MPH |
| Selma yard tracks 3, 4, 5, and 7 | 10 MPH |
| MP 111.5 Alabama River Bridge    | 10 MPH |
| Selma Industrial Lead            | 10 MPH |
| Other Than Main Track            | 10 MPH |

**Post-Transaction.** As stated in CSXT's supplemental information filing (CSXT-9), CSXT plans to make certain improvements to upgrade the Eastern Line to allow for 25 mph speeds (FRA Class II track standards). (CSXT Supp. Information 24.) While the Eastern Line will generally be upgraded to Class II track standards, CSXT anticipates that there may be distinct locations on the Eastern Line operated below 25 mph post-transaction, due to operational or other reasons (*e.g.*, temporary slow orders, diverging moves).

2. *Confirm that there would be no growth in daily carloads switched above the 100% threshold in 49 C.F.R. § 1105.7(e)(5)(B) at any yard on the MNBR line.*

CSXT confirms that there would be no growth in daily carloads switched above the 100% threshold in 49 C.F.R. § 1105.7(e)(5)(B) at any yard on the Eastern Line.

*Additional CSXT Information:*

CSXT wishes to clarify its description of current MNBR operations on the Eastern Line. (See CSXT Appl. APP-196 to APP-197.) As stated in the Application, MNBR currently operates two road trains over the Eastern Line and the Burkeville-Montgomery segment, and AGR operates one road train over the Eastern Line. However, MNBR does not have a separate Selma local train. Rather, MNBR utilizes L125 and L126 to support local customers. Any work west of Selma is considered line of road work for the L125 and L126.

Please contact me with any questions.

Ms. Danielle Gosselin  
January 5, 2024  
Page 8

Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton  
Joshua H. Runyan  
Anthony J. LaRocca  
Sally Mordi  
*Attorneys for CSX Transportation, Inc.*

cc: Louis E. Gitomer  
Diana Wood  
Alan Summerville  
Ian Leidner