



GRANTED

Office of
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DECISION ID NO.: 52509
DECIDED DATE: 3/12/2025
SERVED DATE: 3/12/2025
APPROVED:  Acting Director

EXPEDITED CONSIDERATION REQUESTED

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

309334

ENTERED
Office of Proceedings
March 11, 2025
Part of
Public Record

NORTH AMERICA FREIGHT CAR
ASSOCIATION; AMERICAN FUEL &
PETROCHEMICALS MANUFACTURERS;
THE CHLORINE INSTITUTE; THE
FERTILIZER INSTITUTE; AMERICAN
CHEMISTRY COUNCIL; ETHANOL
PRODUCTS, LLC D/B/A POET ETHANOL
PRODUCTS; POET NUTRITION, INC.; and
CARGILL INCORPORATED,

Complainants,

v.

UNION PACIFIC RAILROAD COMPANY,

Defendant.

STB Docket No. NOR 42144

Consolidated with:

Docket No. NOR 42150

Docket No. NOR 42152

Docket No. NOR 42153

UNION PACIFIC'S UNOPPOSED MOTION FOR EXTENSION OF TIME

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March 11, 2025

UNION PACIFIC'S UNOPPOSED MOTION FOR EXTENSION OF TIME

Union Pacific hereby submits this unopposed motion, which seeks a 30-day extension of the time for filing a reply to the Complainants' March 6, 2025, petition for reconsideration, until April 25, 2025.¹ Union Pacific's reply would otherwise be due on March 26, 2026. *See* 49 C.F.R. § 1104.13(a).

Good cause exists for this extension because the Board previously granted Complainants' unopposed motion for a 30-day extension of time to file their petition. *See* Decision served Jan. 21, 2025. Good cause also exists because Union Pacific and its counsel need the additional time to review the Complainants' petition in light of the extensive evidentiary record in this case and develop a comprehensive reply that will assist the Board in addressing the factual and legal issues raised by Complainants.

Counsel for Union Pacific has conferred with counsel for Complainants and is authorized to represent that Complainants do not oppose this extension request.

Union Pacific also requests expedited consideration of this motion because the current deadline for submitting its reply is in just 15 days.

¹ The complainants seeking reconsideration in Docket No. NOR 42144 are North America Freight Car Association, The Chlorine Institute, Inc., The Fertilizer Institute, American Chemistry Council, Ethanol Products, LLC d/b/a POET Ethanol Products, POET Nutrition, Inc., and Cargill Incorporated (collectively, NAFCA Complainants). The complainants seeking reconsideration in Docket No. NOR 42150 are Valero Marketing and Supply Company and Valero Rail Partners, LLC (collectively, Valero). The complainants seeking reconsideration in Docket No. NOR 42152 are Tesoro Refining & Marketing Company, LLC, Tesoro Great Plains Gathering & Marketing, LLC, and Dakota Prairie Refining, LLC (collectively, Tesoro). The complainant seeking reconsideration in Docket No. NOR 42153 is Arkema, Inc. (Arkema).

Respectfully submitted,

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March 11, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March, 2025, I caused a copy of the foregoing document to be served by first class mail, postage prepaid, or a more expeditious method of service on all parties of record in Docket Nos. NOR 42144, NOR 42150, NOR 42152, and NOR 42153.

/s/ Michael L. Rosenthal
Michael L. Rosenthal