



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

May 8, 2026

Thomas R. Brugato
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Washington, DC 20001

By email at tbrugato@cov.com and pwhitfield@sidley.com

RE: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Information Request No. 4

Dear Mr. Brugato:

Consistent with 49 C.F.R. § 1105.7(f), the Surface Transportation Board's (Board) Office of Environmental Analysis requests the information below, which is needed to support the environmental review in connection with the above-referenced proceeding.

A. Locomotives, Consists, and Track

1. For all rail segments that would exceed the Board's thresholds¹ for environmental analysis, provide the following information:
 - i. Estimated average number of locomotives per train, the average number of railcars per train, and the average and maximum total length (in feet) of trains pre- and post-acquisition
 - ii. Pre- and post-acquisition average speed
 - iii. Pre- and post-acquisition proportion of locomotives in each EPA emissions tier
 - iv. Pre- and post-acquisition fleetwide locomotive average fuel economies (in gross ton miles per gallon of diesel)

B. Rail Yards

1. For all rail yards that would exceed the Board's thresholds² for environmental analysis, provide the following information:

¹ See 49 C.F.R. § 1105.7(e)(5)(i)(A), (ii)(A).

² See 49 C.F.R. § 1105.7(e)(5)(i)(B), (ii)(B).

- i. Estimated pre- and post-acquisition daily switch engine operating hours
- ii. Representative number of rail cars switched per hour of switch engine operation pre- and post-acquisition (e.g., 20 rail cars switched per switch engine-hour pre-acquisition and 24 rail cars switched per switch engine-hour post-acquisition)
- iii. Pre-and post-acquisition switch engine EPA tiers and average fuel efficiency (gal/hour)
- iv. Whether line-haul engines are used for block swapping within yards
- v. Hump yards that use wheel retarders, if any

C. Intermodal Facilities

- 1. For all intermodal facilities that would exceed the Board’s thresholds³ for environmental analysis, provide the following information with and without the proposed transaction. The information should be provided in table format as shown in the template in Attachment 1.
 - i. Railroad (e.g., UP or NS)
 - ii. Intermodal facility name (including U.S. state)
 - iii. Origin/destination lifts per day
 - iv. Switch lifts per day
 - v. Total lifts per day (including secondary lifts)
 - vi. Over the road trucks per day
 - vii. Truck dwell times
 - viii. Average number of truck movements per hour
 - ix. Intermodal facility operating days/hours

D. Hazardous Materials

- 1. Provide a summary of the types of hazardous materials transported on the UP and NS networks pre-acquisition and to be transported on the combined network post-acquisition.
- 2. Provide NS and UP records of hazardous materials releases and derailments and accident/incident frequencies for the years 2021 through 2025.
- 3. For all rail yards that would experience transaction-related increases in rail yard activity of at least one hazmat carload processed per day, provide the following information with and without the proposed transaction. The information requested can be provided using the table format shown in the template in Attachment 2.
 - i. Baseline hazmat carloads processed per day

³ See 49 C.F.R. § 1105.7(e)(5)(i)(C), (ii)(C).

- ii. Year 5 No Transaction hazmat carloads processed per day (including organic growth)
- iii. Year 5 With Transaction hazmat carloads processed per day
- iv. Difference (Year 5 With Transaction – Year 5 No Transaction)

E. Capital Improvements

- 1. Provide the following information regarding the construction and use of main line capital improvements referenced in Section IV of the Service Assurance Plan:
 - i. Whether bridges over waterways would be clear span or require piers and if any additional in-water construction is needed
 - ii. The expected train speed on planned double track capital improvements for the Mohawk to Stoval Double Track, North End Meridian Double Track, and Decatur Second Main Line
 - iii. Expected average post-acquisition dwell time for sidings that would be extended that have at-grade crossings

Please provide your response as soon as possible and no later than **June 12, 2026**. If you have any questions, feel free to contact Elizabeth Webster of my staff at 202-360-0742 or by email at Elizabeth.Webster@stb.gov. Thank you for your assistance in this matter.

Sincerely,



Danielle Gosselin
Director
Office of Environmental Analysis

Enclosure: Templates for Intermodal Facilities Table and Hazmat Carloads in Rail Yards Table

Attachment 2: Template for Hazmat Carloads in Rail Yards Table

Railroad	Yard Name	Baseline Hazmat Carloads Processed Per Day (CPD)	Baseline Organic Growth (5 Years) Hazmat CPD	Year 5 No Transaction Hazmat CPD	Transaction Growth Hazmat CPD	Year 5 With Transaction Hazmat CPD	Difference (Year 5 With Transaction – Year 5 No Transaction)