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July 27, 2026

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

Re: Docket No. FD 36873, Updated Master Segment Tables for Errata Filing

Dear Ms. Gosselin:

I am writing on behalf of Union Pacific Railroad Company (UP) and in coordination with its errata filing on July 27, 2026 to the Surface Transportation Board (Board) addressing the supplementary information request for the Amended Application filed on April 30, 2026. The Applicants are submitting updated versions of both the PDF and Excel Master Data Tables (Master Data Tables for Errata Filing.xlsx) associated with prior responses to OEA's Information Requests (IR) 1 and 2 as well as IR3 Parts A and B. Geospatial files and maps associated with the Master Data Tables will be provided at a later time.

The proposed transaction is an end-to-end combination of the two rail systems and UP and Norfolk Southern (NS) have modeled the impact of the transaction on the combined system's traffic levels and used those traffic forecasts to build a combined Operating Plan detailed in the Amended Application submitted to the Board on April 30, 2026 and the errata filing submitted to the Board on July 27. The accompanying Master Data Tables includes all rail line segments included in the updated workpapers in the errata filing's Electronic Appendix M, as well as manifest rail yards, intermodal ramps, and automotive ramps that exceed relevant Board thresholds or otherwise fall within scope of IR1 & IR2, including data tables for public roadway/rail at-grade crossings and existing quiet zones associated with rail line segments exceeding Board thresholds. UP/NS are also including separate Master Data Tables for rail line segments with transaction related increases that identify: 1) segments with an increase of at least one freight train per day that have current passenger trains and 2) description of operations for rail line segments where freight moves via trackage rights or haulage agreements.

There are two main changes as a result of updating this data to align with the errata filing. First, one additional segment has been identified as exceeding the Board's thresholds. Segment 11784 has an increase in million gross ton miles (mGTM) that resulted in a 50.1% change, therefore

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exceeding the Board's threshold. Second, two additional intermodal ramp facilities have been identified as exceeding the Board's thresholds: Atlanta (Inman) changed to 10.6% Transaction Truck Per Day Change, and Cincinnati (Gest Street) changed to 13.0% Transaction Truck Per Day Change.

All data in this submittal supersedes any previous submittals and is aligned with the updated working papers submitted with the errata filing on July 27. The methodology used to develop this submittal is the same as that described in the April 30, 2026 submission, as summarized below. This letter supplements those Master Data Tables by explaining how they were prepared. UP developed this data package in cooperation with its co-applicant, Norfolk Southern Corporation and Norfolk Southern Railway Company.

Transaction-Related Growth

Requests IR1, IR2, and IR3 (Parts A and B) ask about places on the combined UP/NS network where transaction-related traffic would exceed the Board's thresholds per 49 C.F.R. § 1105.7(e)(5). OEA specified, in IR2, that the calculations include organic growth and provide a year five forecast without a merger transaction. UP/NS have isolated the impact of transaction-related growth as compared to organic growth over five years. For clarity, the methodology for each data column, representing traffic volumes in the "Master Rail Line Segments" table, is described below:

- **Baseline [Annual mGTMs or Trains per Day]¹** – pre-merger operating Volume Measure of a combined UP/NS network, which does not include any effects of a merger transaction.
- **5 Years Organic Growth [Annual mGTMs or Trains per Day]¹** – projected organic growth compounded annually for five-years on the baseline Volume Measures using organic growth rates based on long-term standalone revenue growth assumptions for volume by each railroad. Passenger train operations were excluded from organic growth calculations (see Footnote 3 in the Master Data Tables). The only passenger train per day growth included relates to NS agreements that predate this Transaction (see Footnote 4 in the Master Data Tables).
- **Year 5 [Annual mGTMs or Trains per Day]¹ No Transaction** – projected Volume Measures five years after baseline year assuming no transaction (Baseline Annual "Volume Measure" + 5 Years Organic Growth "Volume Measure").
- **Transaction Growth [Annual mGTMs or Trains per Day]¹** – reflects incremental Volume Measure increases Applicants expect will occur as outlined in the Amended Application Operating Plan, post-transaction.
- **Year 5 [Annual mGTMs or Trains per Day]¹ with Transaction** – reflects fully integrated UP/NS network operations five-years post-transaction (Baseline "Volume Measure" + 5 Years Organic Growth "Volume Measure" + Transaction Growth "Volume Measure").
- **% Transaction [Annual mGTMs or Trains per Day]¹ Change (when applicable)** – percentage of traffic change due to transaction as reflected in fully integrated

¹ For Master Data Tables A3 and A4, the applicable volume measures are Carloads per Day and Trucks per Day, respectively.

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UP/NS network (Transaction Growth "Volume Measure"/[Baseline "Volume Measure" + 5 Years Organic Growth "Volume Measure"]).

Rail Line Segments

UP and NS are providing a complete data table of rail line segments, included in the work paper Electronic Appendix M of the errata filing, with organic growth calculations.² Segments and facilities with volume changes in annual gross ton miles, trains per day, carloads per day, hazardous material carloads per day, or trucks per day are footnoted in the Master Data Tables (table name "Footnotes").

Table "Rail Line Segments"

Rail line segments with transaction-related traffic increases in gross ton miles (GTM) or trains per day (TPD) exceeding the Board's thresholds are identified in column "Exceeds Board Threshold for 49 CFR 1105.7(e)(5)" with a value of "YES". All other rail line segments in the table do not exceed the Board's thresholds for GTM or TPD.

As a result of the errata-related changes, one additional segment has been identified as exceeding the Board's thresholds. Segment 11784 has an increase in mGTM that resulted in a 50.1% change, therefore exceeding the Board's threshold.

Rail Yards & Terminals

Table "Manifest Yards (A3)"

UP/NS define manifest yards as locations with at least 1 car per day of yard activity (i.e., intermediate switching and/or block swapping) that is not at a foreign yard (other than UP or NS), a Port, a customer facility, a run-through interchange, or an Intermodal and/or Auto Ramp only (e.g., no manifest activity). UP/NS assessed transaction-related activity in manifest yards accounting for organic growth and identified the facilities that exceed Board thresholds of either: 1) 100% increase in carloads per day (CPD) for yards in attainment areas or 2) 20% increase in CPD for yards in nonattainment areas.

Table "Intermodal & Auto Ramps (A4)"

UP/NS forecasted truck per day changes, accounting for organic growth, at Intermodal and Automotive Ramps and identified those that exceed Board thresholds due to the Transaction of either: 1) a 10% increase in trucks or 2) an increase of 50 trucks per day.

As a result of the errata-related changes, two additional Intermodal Ramp facilities have been identified as exceeding the Board's thresholds. Atlanta (Inman) changed to 10.6%

² Mileages reported in these tables for certain segments differ from mileages reported in Applicants' Electronic Appendix M associated with the workpapers included in the errata filing. To prepare maps required for environmental review purposes (i.e., to more precisely identify areas of potential environmental impacts), Applicants supplemented network mileage data used in the ordinary course of business for operations planning with GIS data where they determined GIS data were more precise.

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Transaction Truck Per Day Change, and Cincinnati (Gest Street) changed to 13.0% Transaction Truck Per Day Change.

Table “Roadway&At-Grade Crossings (G1)”

UP and NS are providing the Master Data Table listing public roadway/rail at-grade crossings associated with rail line segments that exceed the Board’s thresholds under 49 C.F.R. § 1105.7(e)(5). The data table includes the assigned Federal Railway Administration (FRA) grade crossing inventory number for crossings associated with rail line segments, manifest yards, and Intermodal/Auto Ramps exceeding the Board’s thresholds for 49 C.F.R. § 1105.7(e)(5).

Table “Quiet Zones (G2)”

UP and NS cross-referenced public FRA data with the rail networks to create maps that show public at-grade crossings that are designated as being in a quiet zone. Quiet zones are associated with rail line segments, manifest yards, and Intermodal/Auto Ramps exceeding the Board’s thresholds for 49 C.F.R. § 1105.7(e)(5).

Table “Haulage & Trackage Rights”

UP and NS have identified the rail line segments exceeding the Boards thresholds for 49 C.F.R. § 1105.7(e)(5) which have trackage right & haulage operating agreements. In this Master Data Table, the specific rail line segments operating under one of these agreements are identified as well as the owner railroad and the railroad(s) who operate as tenants. Additional notes on the trackage/haulage agreements are included.

Table “Passenger Segments”

UP/NS are providing the Master Data Table that includes the Segment Key, Segment Name, Average Current Passenger TPD, and notes for segments where the current passenger train volumes vary across a segment or do not use the entirety of a segment. To more precisely identify passenger traffic on these segments UP and NS used the average weekly passenger operations divided by 7, including trains that run on all or a portion of the given rail which may differ from passenger train counts included in the Amended Application’s workpapers and Appendices.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Thomas Brugato