

**Before the
SURFACE TRANSPORTATION BOARD**

STB Docket No. FD 36873

ENTERED
Office of Chief Counsel
September 9, 2026
Part of
Public Record

**UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY
- CONTROL -
NORFOLK SOUTHERN CORPORATION AND
NORFOLK SOUTHERN RAILWAY COMPANY**

**DESCRIPTION OF ANTICIPATED RESPONSIVE APPLICATION BY
HEART OF GEORGIA RAILROAD, INC.**

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September 9, 2026

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Inc.*

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HEART OF GEORGIA RAILROAD, INC.**

In accordance with the Board’s Decision No. 30 served in this proceeding on August 18, 2026, Heart of Georgia Railroad, Inc. (“HOG”) submits this Description of Anticipated Responsive Application.

Background

HOG is a Class III railroad that operates over 227 miles of track in Alabama and Georgia. As relevant to the Proposed Transaction, HOG interchanges with Norfolk Southern Railway Company (“NS”) in Americus, GA.

If the Board does approve the Proposed Transaction, HOG anticipates that it will be seeking as a condition to the Board’s approval, the acquisition of the following described rights that would require a responsive application, to insulate HOG and its customers from any potential negative impacts of the Proposed Transaction.

Description of Anticipated HOG Trackage Rights Requests

HOG anticipates that it may file a responsive application seeking trackage rights over NS extending from Americus, GA to Smithville, GA, including the right of HOG to interchange with Georgia Southwestern Railroad, Inc. in Smithville.

Additional Conditions and Relief

The above description of anticipated responsive application is presented in response to the abbreviated schedule provided by the Board. As the record in this proceeding develops, HOG may elect not to seek the responsive application, and may seek as relief additional conditions, whether or not requiring a responsive application, in its comments and requests for conditions scheduled to be filed November 18, 2026 in accordance with the procedural schedule, or as the Board may modify the procedural schedule in the future.

Respectfully submitted,



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Counsel for Heart of Georgia Railroad, Inc.

Dated: September 9, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September 2026, the foregoing document was served by first-class mail or email upon all parties of record on the service list and the ALJ in this proceeding.



Justin J. Marks