

**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
ILLINOIS & MIDLAND RAILROAD, INC.**

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September 9, 2026

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Inc.*

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ILLINOIS & MIDLAND RAILROAD, INC.**

In accordance with the Board's Decision No. 30 served in this proceeding on August 18, 2026, Illinois & Midland Railroad, Inc. ("IMRR") submits this Description of Anticipated Responsive Application.

Background

IMRR is a Class III railroad that operates over 97 miles of track in Illinois. As relevant to this Proposed Transaction, IMRR interchanges with Union Pacific ("UP") in Crescent and Springfield, Illinois. Norfolk Southern Railway Company ("NS") also operates in Springfield.

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

Description of Anticipated IMRR Trackage Rights Requests

IMRR anticipates that it may file a responsive application seeking trackage rights over a line of railroad in Springfield, Illinois that NS and UP are currently constructing to route current rail traffic around Springfield. IMRR seeks trackage rights (effective upon completion of the project) over this line of railroad known as the NS/UP Springfield Rail Improvements Project

Line starting at the connection point with the IMRR in Springfield and then extending over an existing NS line to the NS connection with Canadian Pacific Railway Company just east of Route 4 and north of Interstate 72.

Additional Conditions and Relief

The above description of an anticipated responsive application is presented in response to the abbreviated schedule provided by the Board. As the record in this proceeding develops, IMRR 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 Illinois & Midland 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 administrative law judge assigned to this proceeding.



Justin J. Marks