

**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
KIAMICHI RAILROAD COMPANY L.L.C.**

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September 9, 2026

*Counsel for Kiamichi Railroad Company
L.L.C.*

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**DESCRIPTION OF ANTICIPATED RESPONSIVE APPLICATION BY
KIAMICHI RAILROAD COMPANY L.L.C.**

In accordance with the Board’s Decision No. 30 served in this proceeding on August 18, 2026, Kiamichi Railroad Company L.L.C. (“KRR”) submits this Description of Anticipated Responsive Application.

Background

KRR is a Class III railroad that operates over 234 miles of track in Arkansas, Oklahoma, and Texas. As relevant to the Proposed Transaction, KRR interchanges with Union Pacific (“UP”) in Durant, Oklahoma and Hope, Arkansas.

If the Board does approve the Proposed Transaction, KRR 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 KRR and its customers from any potential negative impacts of the Proposed Transaction.

Description of Anticipated KRR Trackage Rights Requests

KRR anticipates that it may file a responsive application seeking trackage rights over UP extending from Durant, OK to Denison, TX, including the right of KRR to interchange with Texas Northeastern Railroad in Denison.

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, KRR may elect not to seek all of the responsive applications, 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 Kiamichi Railroad Company L.L.C.

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