Simpson Thacher & Bartlett LLP

900 G Street NW
Washington, DC 20001

TELEPHONE: +1-202-636-5500
FACSIMILE: +1-202-636-5502

Direct Dial Number
+1-202-636-5582

E-mail Address
sara.razi@stblaw.com

CN-37

November 13, 2026

Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

Re: *Docket No. FD 36873 – Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company*

Dear Ms. Gosselin:

On behalf of Grand Trunk Corporation and its U.S. rail operating subsidiaries[1] (collectively, "CN"), we submit the attached supplemental materials to the Office of Environmental Analysis ("OEA") as a follow-up to CN's letter dated October 29, 2026 (CN-36) and in further support of CN's forthcoming responsive applications in connection with CN's proposed condition to purchase Union Pacific's rail line between Kansas City and St. Louis, Missouri and to lease or purchase Union Pacific's Neff Yard:

- **Sub-No. 2** - Illinois Central Railroad Company – Divestiture – Line of Union Pacific Railroad Company between St. Louis, Mo. and Kansas City, Mo.; and
- **Sub-No. 6** - Illinois Central Railroad Company – Lease and Purchase – Union Pacific Railroad Company Neff Yard in Kansas City, Mo.[2]

[1] Bessemer and Lake Erie Railroad Company, Cedar River Railroad Company, Chicago, Central & Pacific Railroad Company, Grand Trunk Western Railroad Company, Illinois Central Railroad Company, Iowa Northern Railway Company, The Pittsburgh & Conneaut Dock Company, and Wisconsin Central Ltd.

[2] Pursuant to 49 C.F.R. § 1105.6(c)(3), CN understands that OEA is not requesting any maps, connecting track plans, or other information relating to trackage rights requests in CN's

OVERVIEW

This submission provides the following information for OEA's review:

- **Maps concerning CN's requested condition to purchase Union Pacific's Kansas City to St. Louis Line, including Union Pacific's former Sarpy Yard property and 23rd Street Yard in St. Louis (Sub-No. 2).**
- **CN's anticipated yard capital improvements for the former Sarpy Yard property in St. Louis, Missouri (Sub-No. 2).**
- **Future rail traffic projections:** OEA's requested five-year projections for anticipated traffic volumes, including the estimated number of trains per day, on the Kansas City Line (Sub-No. 2).
- **Future rail yard activity projections:** OEA's requested five-year projections for the number of railcars and truck traffic handled per day at Neff Yard (Sub-No. 6) and the former Sarpy Yard property and 23rd Street Yard (Sub-No. 2).

CN'S SUPPLEMENTAL INFORMATION

CN provides the following supplemental information.

I. Maps for Former Sarpy Yard Property and 23rd Street Yard in St. Louis (Sub-No. 2)

Enclosed as **Exhibit A**, CN is providing multiple maps concerning its plan to utilize Union Pacific's former Sarpy Yard property and 23rd Street Yard, both of which are in St. Louis, as part of its requested condition for divestiture of Union Pacific's Kansas City to St. Louis Line. These maps follow the same approach and level of detail as the Neff Yard maps CN provided to OEA on October 29 for Sub-No. 6.

II. Anticipated Yard Capital Improvements for Former Sarpy Yard Property (Sub-No. 2)

Enclosed as **Exhibit B**, CN is providing its anticipated capital improvements for the former Sarpy Yard property based upon information available at this time. CN does not anticipate capital improvements at the 23rd Street Yard in St. Louis. In both Neff Yard and the former Sarpy Yard property, CN plans to invest in new intermodal and automotive terminals. Importantly, for both yards, CN anticipates that any improvements will occur within the existing boundary of the yard.[3]

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forthcoming responsive applications: Docket Sub-No. 7 (Tuscola, Illinois to East St. Louis, Illinois), Sub-No. 8 (Lenox in Mitchell, Illinois to East St. Louis, Illinois), Sub-No. 9 (Hillsboro, Illinois), Sub-No. 10 (Manly/Iowa Falls, Iowa to Des Moines/Avon, Iowa), and Sub-No. 34 (Carlinville, Illinois). CN previously submitted maps related to Sub-No. 5 (terminal trackage rights between Eton, Missouri and Congo, Missouri near Kansas City).

[3] CN provided the anticipated extent of its capital improvements in Neff Yard (Sub-No. 6) in its October 29, 2026 submission to OEA (CN-36).

III. Anticipated Five-Year Traffic Projections

Enclosed as **Exhibit C**, CN is providing the five-year traffic projections OEA has requested for the divestiture of Union Pacific's Kansas City Line (Sub-No. 2), including the anticipated number of trains per day.

IV. Anticipated Five-Year Yard Activity Projections

Enclosed as **Exhibit D**, CN is providing the five-year projections OEA has requested for the number of railcars and truck traffic to be handled per day at Neff Yard (Sub-No. 6) and the former Sarpy Yard property (Sub-No. 2).

CN is not planning any loading/unloading or intermodal activities at the 23rd Street Yard. Rather, tracks in this yard would be used as staging and head room for trains utilizing the former Sarpy Yard property. For this reason, the enclosed rail yard activity projections focus on Neff Yard and the former Sarpy Yard property.

V. One Environmental Impact Statement

Pursuant to the Board's Decision No. 21 in this proceeding, CN understands that OEA will be preparing one Environmental Impact Statement ("EIS") to assess Applicants' proposed transaction and any responsive applications seeking specific conditions for the Board's consideration. *See* EB-53052, FD 36873 at 37 (May 28, 2026) ("an EIS is warranted in light of the potential for significant impacts of the Transaction on numerous communities across the United States that would likely result from increased activity levels on rail line segments and at rail facilities."); *id.* at 39 (the EIS "will analyze in detail the potential environmental impacts of the Transaction, respond to public comments on the [Notice of Intent to perform the EIS], and, if appropriate, make recommendations for environmental mitigation.").

CN supports OEA's holistic approach, which is consistent with the National Environmental Policy Act ("NEPA") and the Board's acknowledgment that it "will consider the entire record," "all public and agency comments received," and "what conditions, including environmental mitigation conditions, to impose" in reaching its final decision. EB-53052, FD 36873 at 39; *see also D.C. Pres. League v. U.S. Dep't of the Interior*, No. 1:26-cv-477, 2026 U.S. Dist. LEXIS 244887, at *79–83 (D.D.C. Oct. 26, 2026) (holding that post-*Seven County*, NEPA still requires agencies to consider related actions and avoid improper segmentation); 42 U.S.C. § 4332(2)(C) (environmental statement must "detail[]," among other things, the "reasonable range of alternatives to the proposed agency action").

VI. Attainment Area Status Under the Clean Air Act

One component of OEA's environmental review involves assessing (1) whether there is an increase in rail traffic of at least eight trains per day in "attainment" areas or at least three trains per day in "nonattainment" areas under the Clean Air Act, and (2) whether there is increased activity at rail yards (including intermodal facilities) of at least 100% in "attainment" areas or at least 20% in "nonattainment" areas, in both cases measured by carload activity. EB-53052, FD 36873 at 37 (citing 49 C.F.R. § 1105.7(e)(5)).

With respect to CN's proposed conditions concerning divestiture of the Kansas City-St. Louis Line (including the former Sarpy Yard property and 23rd Street Yard) (Sub-No. 2) and lease/purchase of Neff Yard (Sub-No. 6), CN has assessed whether these areas are currently in attainment or nonattainment status by reviewing United States Environmental Protection Agency resources.[4] Based on that review:

- In the St. Louis area, several counties are currently in nonattainment for the 2015 8-hour ozone standard: Madison County and St. Clair County, Illinois; and St. Louis County and part of Franklin County, Missouri. Additionally, the City of St. Louis (where the former Sarpy Yard property and 23rd Street Yard are located) is in nonattainment for the 2015 8-hour ozone standard.
- No nonattainment areas are located in the Kansas City area or along the Kansas City Line (outside of the St. Louis area).

A. CN's Anticipated Increase in Trains Per Day

CN's estimated five-year traffic projections (**Exhibit C**) indicate that its proposed merger-related operations on the Kansas City-St. Louis Line (Sub-No. 2) would add the following:

- four trains per day above Union Pacific's baseline and projected growth model post-transaction between St. Louis and River Junction,
- two trains per day over the River Subdivision, and
- two trains per day over the Sedalia Subdivision.

Although the anticipated four trains per day in St. Louis exceeds the Board's threshold of three trains per day in nonattainment areas, that exceedance does not indicate that CN's proposed divestiture condition of the Kansas City-St. Louis Line presents any significant environmental effects. *See, e.g.*, *Seven Cnty. Infrastructure Coal. v. Eagle Cnty.*, 605 U.S. 168, 172 (2025) ("The EIS must address the significant environmental effects of a proposed project and identify feasible alternatives that could mitigate those effects."). The thresholds in 49 C.F.R. § 1105.7(e)(5) are a screening mechanism to determine whether environmental documentation is warranted in the first instance. *See* 49 C.F.R. § 1105.6(c)(1) ("No environmental documentation will normally be prepared" for actions below the applicable thresholds). Here, the Board already has decided that OEA will prepare a holistic EIS. EB-53052, FD 36873 at 37, 39. In so doing, OEA "may weigh environmental consequences as the agency reasonably sees fit under its governing statute and any relevant substantive environmental laws." *Seven Cnty.*, 605 U.S. at 173.

B. CN's Anticipated Rail Yard Activity

The Applicants did not provide rail yard truck or railcar counts to OEA covering the former Sarpy Yard property, 23rd Street Yard, or Neff Yard.[5]

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[4] USEPA Office of Air and Radiation, Non-Attainment Areas and Designations, https://services.arcgis.com/cJ9YHowT8TU7DUyn/arcgis/rest/services/Nonattainment_Areas_and_Designations/FeatureServer (last visited Nov. 5, 2026).

[5] *See* UP-NS Response to OEA for Second Errata Filing, Information Request A3 and A4, EI-34308 and EI-34309, FD 36873 (filed Sept. 9, 2026).

In St. Louis, because Union Pacific does not use the former Sarpy Yard property (Sub-No. 2) and the yard therefore has a utilization rate of zero, CN's estimated five-year traffic projections (**Exhibit D**) necessarily would reflect an increase of more than 100%. However, in this situation, the Board already has determined that the air quality threshold does not apply. *See Mo. Cent. R.R.—Acquisition & Operation Exemption—Lines of Union Pac. R.R.*, 4 S.T.B. 391, 397 (1999) (reaffirming that rail yard activity increase threshold of 100% (for an attainment area) is "inappropriate to apply" to a base activity level of zero).

For the 23rd Street Yard (Sub-No. 2), as mentioned above, CN does not anticipate any loading/unloading or intermodal activities. Consequently, there is no increase in rail yard activity as measured by carload activity. *See* 49 C.F.R. § 1105.7(e)(5)(ii)(B).

In Kansas City, with respect to Neff Yard (Sub-No. 6), Union Pacific does not use Neff Yard for intermodal or automotive traffic.[6] Nor does Union Pacific use Neff Yard for classifying railcars.[7] Applicants have stated that Neff Yard is part of their "Contingency Plans for Kansas City" in the Service Assurance Plan.[8] CN thus assumes baselines of zero trucks and zero carloads per day.

* * *

Thank you for your attention to this matter, and please do not hesitate to contact me directly if you have any questions. CN remains committed to promptly responding to any supplemental requests from OEA.

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[6] *See* UP-39/NS-37, FD 36873, Vol. 2, at 683 (filed Apr. 30, 2026) ("UP recently relocated its intermodal operations from Neff Yard, a repurposed hump yard, to its new Kansas City Intermodal Terminal."); *see also New Kansas City Terminal Begins Operations July 15*, https://www.up.com/customers/announcements/premium/internationalintermodalterminals/PR2025-44.html (June 16, 2025) ("Our current Kansas City facility will be closed effective Monday, July 21, 2025 at 1600.").

[7] *Neff Yard Sits Nearly Empty After Union Pacific Announcement* (Oct. 17, 2019), https://www.kshb.com/news/local-news/neff-yard-sits-nearly-empty-after-union-pacific-announcement; *Union Pacific closes Neff Yard in Northeast*, https://northeastnews.net/pages/union-pacific-closes-neff-yard-northeast/ (Oct. 23, 2019).

[8] UP-39/NS-37, FD 36873 at 1125. In the Service Assurance Plan, Applicants "documented their contingency plans for addressing merger-related service disruptions on the main lines identified above and in …Chicago, St. Louis, Kansas City, Memphis, and New Orleans, including the elements described in the following sections, in Appendix A." *Id*. at 1033. In Appendix A, Applicants' "Contingency Plans for Kansas City" list Neff Yard as a Manifest Yard/Terminal, as "Buffer Resources" for "Yard/Terminal Substitutes" for Manifest Capacity; and in "Car Inventory Reduction Management." *Id.* at 1125 ("UP will store excess cars in the first instance at terminals and mainlines adjacent to the Kansas City Gateway likely to have excess capacity. Examples include facilities at Neff and North Kansas City.").

Respectfully submitted,

/s/ Sara Y. Razi

Sara Y. Razi
Abram J. Ellis
Lindsey Bohl
Simpson Thacher & Bartlett LLP
900 G Street, NW
Washington, D.C. 20001
(202) 636-5500
sara.razi@stblaw.com
aellis@stblaw.com
lindsey.bohl@stblaw.com

Thomas J. Litwiler
Valerie O. Quinn
Fletcher & Sippel LLC
29 North Wacker Drive, Suite 800
Chicago, IL 60606-3208
(312) 252-1508
tlitwiler@fletcher-sippel.com
vquinn@fletcher-sippel.com

Attorneys for CN

Olivier Chouc
CN
935 de La Gauchetière Street West, 16th Floor
Montréal, QC H3B 2M9
CANADA

Kathryn J. Gainey
Christopher K. Diamond
Davon M. Collins
CN
975 F Street, NW, Suite 301
Washington, D.C. 20004
kathryn.gainey@cn.ca
christopher.diamond@cn.ca
davon.collins@cn.ca

CERTIFICATE OF SERVICE

I hereby certify that, on November 13, 2026, I caused a true and correct copy of the foregoing to be served by first-class mail or email on all parties of record in this proceeding, the Secretary of Transportation, the Attorney General, and Administrative Law Judge Jenifer Soulikias.

/s/ Andrew Bernstein
Andrew Bernstein
Simpson Thacher & Bartlett LLP

Exhibit A

23rd Street Yard – East Side



Note: Based on CN's knowledge of publicly available information, Union Pacific's property ownership is primarily limited to the identified tracks themselves. At this time, CN does not anticipate making any infrastructure investments in the 23rd Street Yard.

Sources: UP-40/NS-38, "GIS Shape Files.Zip," "UP_Yard_Track" and "UP_Main" Shapefile.

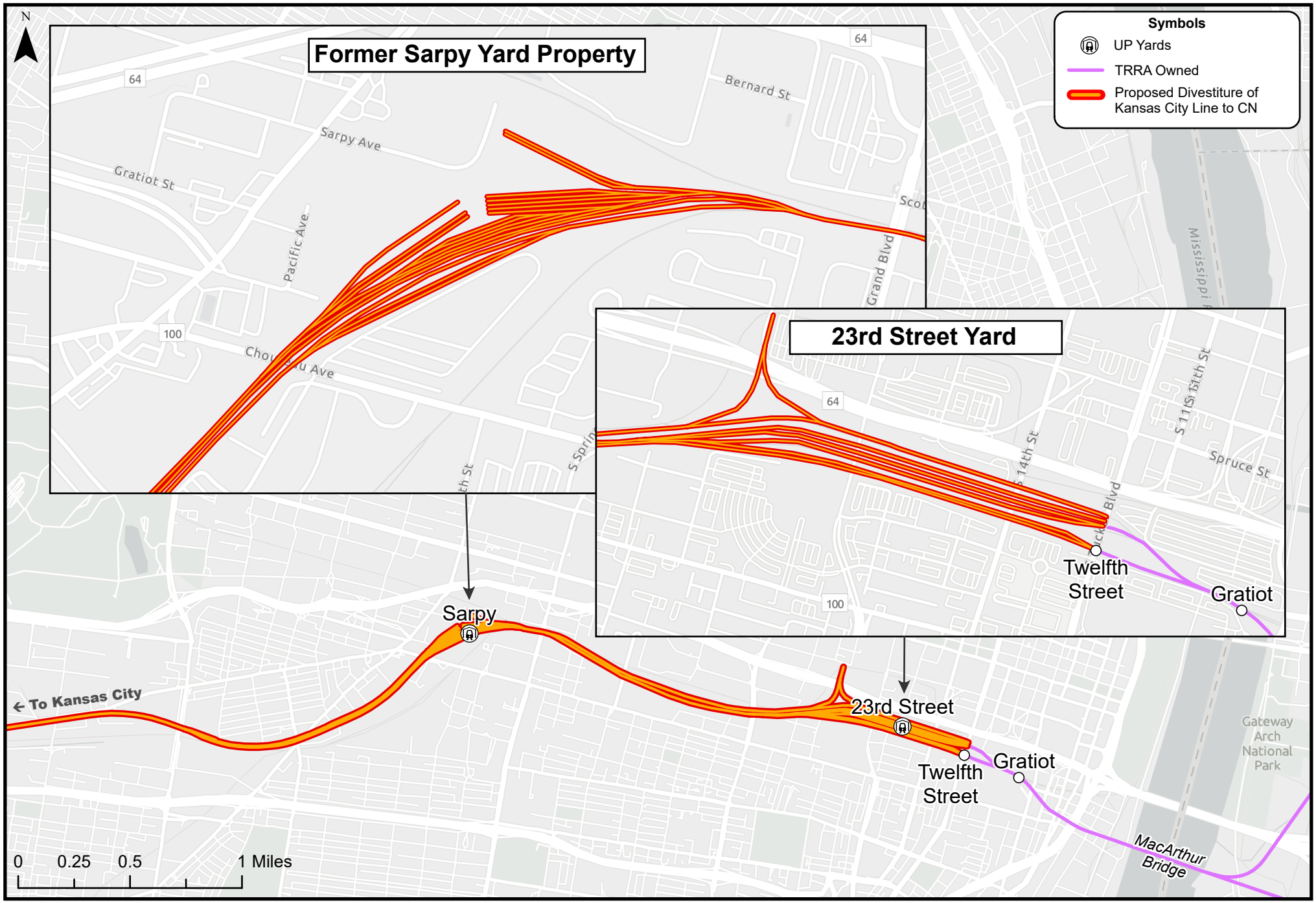
23rd Street Yard – West Side



Note: Based on CN's knowledge of publicly available information, Union Pacific's property ownership is primarily limited to the identified tracks themselves. At this time, CN does not anticipate making any infrastructure investments in the 23rd Street Yard.

Sources: UP-40/NS-38, "GIS Shape Files.Zip," "UP_Yard_Track" and "UP_Main" Shapefile.

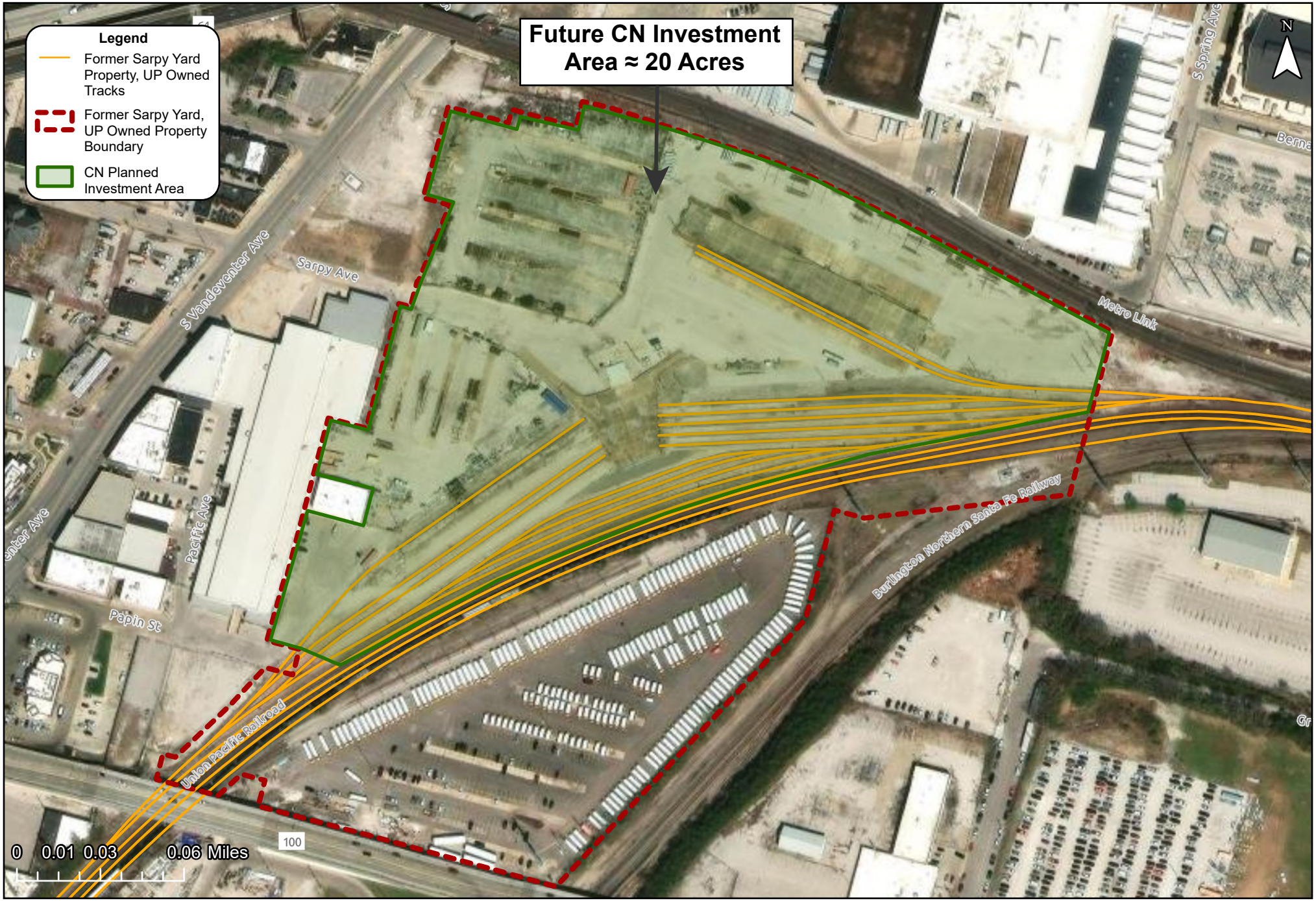
Kansas City Line, Former Sarpy Yard Property, and 23rd Street Yard



Sources: Federal Railroad Administration Shapefiles; Railinc Centralized Station Master; UP-40/NS-38, "GIS Shape Files.Zip," "UP_Yard_Track" and "UP_Main" Shapefile.

Exhibit B

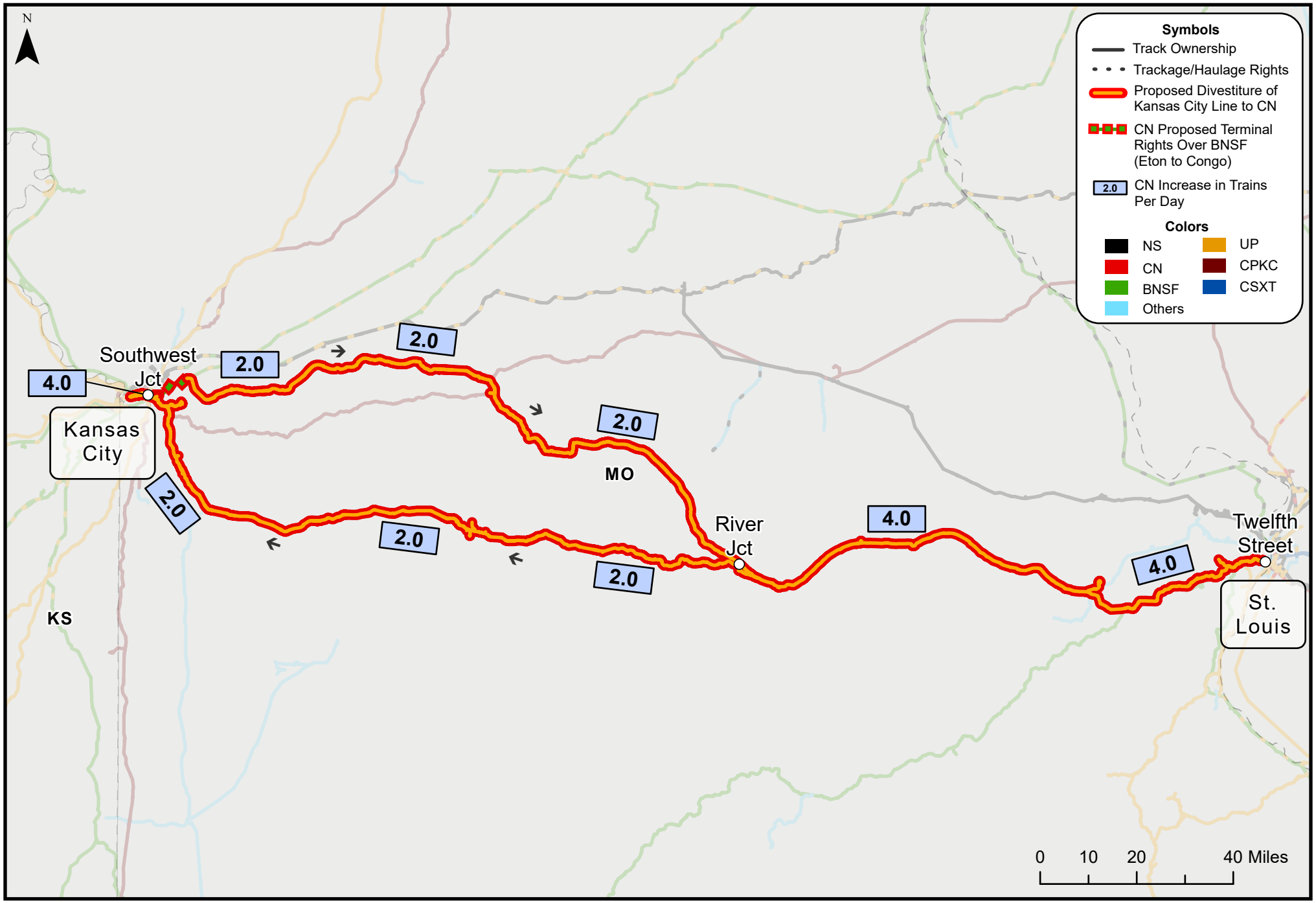
Former Sarpy Yard Property – CN Investment Area



Sources: UP-40/NS-38, "GIS Shape Files.Zip," "UP_Yard_Track" and "UP_Main" Shapefile; St. Louis, MO, Current Parcels Shapefile, www.stlouis-mo.gov/data/datasets/dataset.cfm?id=82

Exhibit C

CN Trains Per Day Increases Associated with Proposed Divestiture of Kansas City Line to CN



Sources: Federal Railroad Administration Shapefiles; Railinc Centralized Station Master.

Exhibit C-1

Rail Line Segments - Trains per Day

Segment Key	Segment Name	Trains Per Day: UP Baseline Trains Per Day (incl. Locals)	UP 5 Years Organic Growth TPD (incl. Locals)	UP Year 5 No Transaction TPD (incl. Locals)	UP/NS Transaction Growth TPD (incl. Locals)	UP/NS Year 5 with Transaction TPD (incl. Locals)	Average Current Passenger TPD	CN Transaction Growth TPD	Total Year 5 TPD (UP/NS + CN)
113601	113601-OTHER SARPYAVE MO_UP-ST LOUIS MO_UP	32.87	1.37	34.24	2.00	36.24	6.00	**4**	**40.24**
10283	10283-JEFFERSON CITY SUB	17.98	0.71	18.69	2.00	20.69	4.00	**4**	**24.69**
10284	10284-JEFFERSON CITY SUB	20.70	0.85	21.55	2.00	23.55	4.00	**4**	**27.55**
10285	10285-SEDALIA SUB	12.40	0.43	12.83	0.98	13.81	4.00	**2**	**15.81**
10286	10286-SEDALIA SUB	15.29	0.58	15.87	0.99	16.86	4.00	**2**	**18.86**
10927	10927-OTHER RIVER JCT-MARSHALL JCT	8.16	0.42	8.58	1.01	9.59	0.00	**2**	**11.59**
12232	12232-OTHER G 073_UP - G 145_UP	8.16	0.42	8.58	1.01	9.59	0.00	**2**	**11.59**
12467	12467-OTHER G 153_UP - MX276_UP	11.01	0.56	11.57	1.06	12.63	0.00	**2**	**14.63**
11864	11864-OTHER SOUTHWEST JCT-ROCK CREEK JCT	13.61	0.69	14.30	1.05	15.35	0.00	**4**	**19.35**
104111	104111-COFFEYVILLE SUB	42.18	2.15	44.33	0.00	44.33	0.00	**4**	**48.33**
12346	12346-OTHER LYDIAAVE MO_UP-KANSAS CITY MO_U	56.53	2.88	59.41	0.00	59.41	0.00	**4**	**63.41**

Source: UP-NS Response to OEA for Second Errata Filing, Master Data Table - Rail Line Segments, EI-34308 and EI-34309, FD 36873 (filed September 9, 2026).

Exhibit C-2

Rail Line Segments - Gross Ton Miles

Segment Key	Segment Name	Segment Distance (GIS miles)	Start Station	Start City/Station	Start State	Start Subdivision Name	Start Milepost	End Station	End City/Station	End State	End Subdivision Name	End Milepost
113601	113601-OTHER SARPYAVE MO_UP-ST LOUIS MO_UP	1.8	MX002	SARPYAVE	MO	MACARTHUR BRIDGE (TRRA)	2.4	MX001	ST LOUIS	MO	MACARTHUR BRIDGE (TRRA)	0.5
10283	10283-JEFFERSON CITY SUB	41.9	MX002	SARPYAVE	MO	MACARTHUR BRIDGE (TRRA)	2.4	MX044	WEST LABADIE	MO	JEFFERSON CITY SUB	43.7
10284	10284-JEFFERSON CITY SUB	80.2	MX044	WEST LABADIE	MO	JEFFERSON CITY SUB	43.7	MX128	RIVER JCT	MO	RIVER SUB	128.0
10285	10285-SEDALIA SUB	120.4	MX128	RIVER JCT	MO	RIVER SUB	128.0	MX249	PLEASANT HILL	MO	SEDALIA SUB	247.8
10286	10286-SEDALIA SUB	27.6	MX249	PLEASANT HILL	MO	SEDALIA SUB	247.8	MX276	ROCK CREEK JCT	MO	RIVER SUB	445.0
10927	10927-OTHER RIVER JCT-MARSHALL JCT	74.0	MX128	RIVER JCT	MO	RIVER SUB	128.0	G 073	MARSHALL JCT	MO	RIVER SUB	202.1
12232	12232-OTHER G 073_UP - G 145_UP	73.8	G 073	MARSHALL JCT	MO	RIVER SUB	202.1	G 145	ETON	MO	RIVER SUB	276.0
12467	12467-OTHER G 153_UP - MX276_UP	0.8	G 153	CONGO	MO	RIVER SUB	444.3	MX276	ROCK CREEK JCT	MO	RIVER SUB	445.0
11864	11864-OTHER SOUTHWEST JCT-ROCK CREEK JCT	2.6	MX277	SOUTHWEST JCT	MO	KC METRO (NEFF)	277.9	MX276	ROCK CREEK JCT	MO	RIVER SUB	445.0
104111	104111-COFFEYVILLE SUB	1.1	MX283	KANSAS CITY	MO	KC METRO (COFFEYVILLE) SUB	279.0	MX277	SOUTHWEST JCT	MO	KC METRO (COFFEYVILLE) SUB	280.0
12346	12346-OTHER LYDIAAVE MO_UP-KANSAS CITY MO_U	1.2	MX283L	LYDIAAVE	MO	KC METRO (NEFF)	281.7	MX283	KANSAS CITY	MO	RIVER SUB	445.0

Source: UP-NS Response to OEA for Second Errata Filing, Master Data Table - Rail Line Segments, EI-34308 and EI-34309, FD 36873 (filed September 9, 2026).

Note 1: Assumed additional organic growth of 3% per year on CN traffic from year 3 to year 5.

Exhibit C-2

Rail Line Segments - Gross Ton Miles

Segment Key	Segment Name	Annual Million Gross Ton Miles (mGTMs)								
		UP Baseline Annual mGTMs	UP 5 Years Organic Growth mGTMs	UP Year 5 No Transaction mGTMs	UP/ NS Transaction Growth mGTMs	UP/NS Year 5 with Transaction mGTMs	CN Transaction Growth mGTMs	CN Year 4 and 5 Organic Growth mGTMs[1]	CN Year 5 with Organic Growth mGTMs	Total Year 5 Transaction mGTMs
113601	113601-OTHER SARPYAVE MO_UP-ST LOUIS MO_UP	105.56	5.38	110.94	26.77	137.72	**15.15**	**0.92**	**16.08**	**153.79**
10283	10283-JEFFERSON CITY SUB	1,787.72	91.19	1,878.91	480.70	2,359.61	**321.03**	**19.55**	**340.58**	**2,700.19**
10284	10284-JEFFERSON CITY SUB	4,389.15	223.89	4,613.04	892.43	5,505.47	**614.48**	**37.42**	**651.90**	**6,157.37**
10285	10285-SEDALIA SUB	2,654.52	135.41	2,789.93	775.14	3,565.07	**498.26**	**30.34**	**528.60**	**4,093.67**
10286	10286-SEDALIA SUB	608.31	31.03	639.34	173.79	813.14	**114.22**	**6.96**	**121.17**	**934.31**
10927	10927-OTHER RIVER JCT-MARSHALL JCT	2,651.50	135.25	2,786.75	379.70	3,166.44	**260.74**	**15.88**	**276.62**	**3,443.06**
12232	12232-OTHER G 073_UP - G 145_UP	2,598.86	132.57	2,731.42	372.19	3,103.61	**260.04**	**15.84**	**275.87**	**3,379.48**
12467	12467-OTHER G 153_UP - MX276_UP	25.94	1.32	27.26	2.61	29.87	**2.82**	**0.17**	**2.99**	**32.86**
11864	11864-OTHER SOUTHWEST JCT-ROCK CREEK JCT	58.31	2.97	61.29	17.11	78.39	**19.92**	**1.21**	**21.13**	**99.53**
104111	104111-COFFEYVILLE SUB	121.64	6.20	127.85	12.93	140.77	**8.43**	**0.51**	**8.94**	**149.71**
12346	12346-OTHER LYDIAAVE MO_UP-KANSAS CITY MO_U	119.98	6.12	126.10	9.28	135.38	**9.19**	**0.56**	**9.75**	**145.14**

Source: UP-NS Response to OEA for Second Errata Filing, Master Data Table - Rail Line Segments, EI-34308 and EI-34309, FD 36873 (filed September 9, 2026).

Note 1: Assumed additional organic growth of 3% per year on CN traffic from year 3 to year 5.

Exhibit C-3

Rail Line Segments - Carloads

Segment Key	Segment Name	Segment Distance (GIS miles)	Start Station	Start City/Station	Start State	Start Subdivision Name	Start Milepost	End Station	End City/Station	End State	End Subdivision Name	End Milepost
113601	113601-OTHER SARPYAVE MO_UP-ST LOUIS MO_UP	1.8	MX002	SARPYAVE	MO	MACARTHUR BRIDGE (TRRA)	2.4	MX001	ST LOUIS	MO	MACARTHUR BRIDGE (TRRA)	0.5
10283	10283-JEFFERSON CITY SUB	41.9	MX002	SARPYAVE	MO	MACARTHUR BRIDGE (TRRA)	2.4	MX044	WEST LABADIE	MO	JEFFERSON CITY SUB	43.7
10284	10284-JEFFERSON CITY SUB	80.2	MX044	WEST LABADIE	MO	JEFFERSON CITY SUB	43.7	MX128	RIVER JCT	MO	RIVER SUB	128.0
10285	10285-SEDALIA SUB	120.4	MX128	RIVER JCT	MO	RIVER SUB	128.0	MX249	PLEASANT HILL	MO	SEDALIA SUB	247.8
10286	10286-SEDALIA SUB	27.6	MX249	PLEASANT HILL	MO	SEDALIA SUB	247.8	MX276	ROCK CREEK JCT	MO	RIVER SUB	445.0
10927	10927-OTHER RIVER JCT-MARSHALL JCT	74.0	MX128	RIVER JCT	MO	RIVER SUB	128.0	G 073	MARSHALL JCT	MO	RIVER SUB	202.1
12232	12232-OTHER G 073_UP - G 145_UP	73.8	G 073	MARSHALL JCT	MO	RIVER SUB	202.1	G 145	ETON	MO	RIVER SUB	276.0
12467	12467-OTHER G 153_UP - MX276_UP	0.8	G 153	CONGO	MO	RIVER SUB	444.3	MX276	ROCK CREEK JCT	MO	RIVER SUB	445.0
11864	11864-OTHER SOUTHWEST JCT-ROCK CREEK JCT	2.6	MX277	SOUTHWEST JCT	MO	KC METRO (NEFF)	277.9	MX276	ROCK CREEK JCT	MO	RIVER SUB	445.0
104111	104111-COFFEYVILLE SUB	1.1	MX283	KANSAS CITY	MO	KC METRO (COFFEYVILLE) SUB	279.0	MX277	SOUTHWEST JCT	MO	KC METRO (COFFEYVILLE) SUB	280.0
12346	12346-OTHER LYDIAAVE MO_UP-KANSAS CITY MO_U	1.2	MX283L	LYDIAAVE	MO	KC METRO (NEFF)	281.7	MX283	KANSAS CITY	MO	RIVER SUB	445.0

Source: UP-NS Response to OEA for Second Errata Filing, Master Data Table - Rail Line Segments, EI-34308 and EI-34309, FD 36873 (filed September 9, 2026).

Note 1: Assumed additional organic growth of 3% per year on CN traffic from year 3 to year 5.

Exhibit C-3

Rail Line Segments - Carloads

Segment Key	Segment Name	Annual Carloads								
		UP Baseline Annual Carloads	UP 5 Years Organic Growth Carloads	UP Year 5 No Transaction Carloads	UP/NS Transaction Growth Carloads	UP/NS Year 5 with Transaction Carloads	CN Transaction Growth Carloads	CN Year 4 and 5 Organic Growth Carloads[1]	CN 5 Years with Organic Growth Carloads[1]	Total Year 5 Transaction Carloads
113601	113601-OTHER SARPYAVE MO_UP-ST LOUIS MO_UP	462,763	23,606	486,369	104,419	590,788	**53,473**	**3,257**	**56,730**	**647,518**
10283	10283-JEFFERSON CITY SUB	427,397	21,802	449,199	104,933	554,132	**48,398**	**2,947**	**51,346**	**605,478**
10284	10284-JEFFERSON CITY SUB	589,986	30,095	620,081	104,765	724,846	**48,398**	**2,947**	**51,346**	**776,192**
10285	10285-SEDALIA SUB	287,582	14,670	302,252	63,308	365,560	**27,637**	**1,683**	**29,320**	**394,880**
10286	10286-SEDALIA SUB	312,528	15,942	328,470	63,168	391,638	**27,637**	**1,683**	**29,320**	**420,958**
10927	10927-OTHER RIVER JCT-MARSHALL JCT	313,091	15,971	329,062	41,248	370,310	**20,761**	**1,264**	**22,026**	**392,336**
12232	12232-OTHER G 073_UP - G 145_UP	313,007	15,967	328,974	41,249	370,223	**20,761**	**1,264**	**22,026**	**392,249**
12467	12467-OTHER G 153_UP - MX276_UP	375,896	19,174	395,070	33,831	428,901	**20,761**	**1,264**	**22,026**	**450,927**
11864	11864-OTHER SOUTHWEST JCT-ROCK CREEK JCT	456,112	23,266	479,378	94,584	573,962	**48,398**	**2,947**	**51,346**	**625,308**
104111	104111-COFFEYVILLE SUB	1,386,434	70,722	1,457,156	93,573	1,550,729	**48,398**	**2,947**	**51,346**	**1,602,075**
12346	12346-OTHER LYDIAAVE MO_UP-KANSAS CITY MO_U	1,820,200	92,848	1,913,048	81,118	1,994,166	**48,398**	**2,947**	**51,346**	**2,045,512**

Source: UP-NS Response to OEA for Second Errata Filing, Master Data Table - Rail Line Segments, EI-34308 and EI-34309, FD 36873 (filed September 9, 2026).

Note 1: Assumed additional organic growth of 3% per year on CN traffic from year 3 to year 5.

Exhibit D

Exhibit D-1

Intermodal & Auto Ramps

Yard Code	Owner Railroad	Yard Name	Latitude	Longitude	State	Type	Baseline Trucks Per Day[1]	CN Transaction Growth Trucks Per Day	CN Year 4 and 5 Organic Growth Trucks Per Day[2]	CN Year 5 Trucks Per Day with Transaction
MX283	CN	Neff	39.1235431°N	94.5215251°W	MO	Auto	0	**113.3**	**6.9**	**120.2**
MX002	CN	Sarpy	38.6294104°N	90.2421975°W	MO	Auto	0	**8.4**	**0.5**	**8.9**
MX283	CN	Neff	39.1235431°N	94.5215251°W	MO	Intermodal	0	**351.4**	**21.4**	**372.8**
MX002	CN	Sarpy	38.6294104°N	90.2421975°W	MO	Intermodal	0	**28.4**	**1.7**	**30.2**

Note 1: CN assumes a baseline of 0 trucks per day at Neff Yard.

Note 2: Assumed additional organic growth of 3% per year on CN traffic from year 3 to year 5.

Exhibit D-2

Cars per Day at Yards

Yard Code	Owner Railroad	Yard Name	Latitude	Longitude	State	Baseline Carloads Per Day[1]	CN Transaction Growth Carloads Per Day[2]	CN Year 4 and 5 Organic Growth Carloads Per Day[3]	CN Year 5 Carloads Per Day with Transaction
MX283	CN	Neff	39.1235431°N	94.5215251°W	MO	0	**188.9**	**11.5**	**200.4**
MX002	CN	Sarpy	38.6294104°N	90.2421975°W	MO	0	**8.8**	**0.5**	**9.4**
MX001	CN	23rd Street	38.6232054°N	90.2055489°W	MO	0	**10.2**	**0.6**	**10.8**

Note 1: CN assumes a baseline of 0 carloads per day at Neff Yard.

Note 2: Includes all traffic types.

Note 3: Assumed additional organic growth of 3% per year on CN traffic from year 3 to year 5.