

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

NOR 42144, 42150, 42152, 42153

Defendant.

None.

3. Plans to Address Outstanding Discovery

Arkema is collecting and reviewing records on a rolling basis to facilitate responses to Union Pacific's discovery requests. Arkema is planning to substantially complete production by March 19, 2018, and will update this estimate as necessary.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

/s/ Jason D. Tutrone
Jeffrey O. Moreno
Jason D. Tutrone
Thompson Hine LLP
1919 M St. NW, Suite 700
Washington, DC 20036
(202) 331-8800

Counsel for Arkema Inc.

Date: February 22, 2018

Certificate of Service

I certify that, on February 22, 2018, I caused a copy of the foregoing document to be served by e-mail on counsel for all parties of record in this proceeding and on the Honorable John P. Dring of the Federal Energy Regulatory Commission.

/s/ Jason D. Tutrone
Jason D. Tutrone