

Before the
Surface Transportation Board

JR - 6
238243

STB DOCKET NO. AB-156 (Sub-No. 27X)

ENTERED
Office of Proceedings
April 20, 2015
Part of
Public Record

**DELAWARE AND HUDSON RAILWAY COMPANY, INC. –
DISCONTINUANCE OF TRACKAGE RIGHTS EXEMPTION --
IN NY, PA, NJ, MD, VA AND DC**

MOTION / PETITION TO REJECT / REVOKE

D & H'S DISCONTINUANCE OF TRACKAGE RIGHTS EXEMPTION

NOTE: Riffin is seeking discovery. A discovery request was served on counsel for the D&H on April 17, 2015. A copy of Riffin's discovery request was filed with the STB on April 17, 2015. See JR-2, Request for Documents. A First Supplemental discovery request, see JR - 2-A, was served via e-mail upon the D&H on April 20, 2015. A copy of the First Supplemental discovery request was also e-filed with the STB on April 20, 2015.

NOTE: This Petition is being e-filed. A check in the amount of \$300.00, the filing fee, is being sent to the STB via the U.S. Postal Service.

NOTE: Exhibits contain color images.

Filed by:

James Riffin
P. O. Box 4044
Timonium, MD 21094
(443) 414-6210

FILED
April 20, 2015
Surface Transportation Board

FEE RECEIVED
April 20, 2015
Surface Transportation Board

1. James Riffin (“**Riffin**”), herewith moves / petitions to reject / revoke, the Notice of Exemption filed by the Delaware and Hudson Railway Company, Inc. (“**D&H**”) in the above entitled proceeding, which Exemption was filed on March 19, 2015, and in support hereof, states:

2. The heading of the Exemption lists a number of **counties** that the subject trackage rights are located in. Unfortunately, **the heading DOES NOT list ALL of the counties that the trackage rights are located in, as enumerated below.** [The NJ counties of Hudson and Middlesex **are not listed** in the heading.]

3. On pp. 3-4 of the Exemption, the Exemption lists a number of the **Zip Codes** that the trackage rights are located in. Unfortunately, **the Zip Code List DOES NOT list ALL of the Zip Codes that the trackage rights are located in, as enumerated below.** [Three in Hudson County, NJ (07302, 07304, 07305); Three in Middlesex County, NJ (07061, 07080, 08820); Three in Somerset County, NJ (08821, 08869, 08876); Four in Hunterdon County, NJ (08826, 08829, 08833, 08889); Two in Harford County, MD (21085 - Joppatown, 21101 - Magnolia); One in Baltimore County (21027 - Chase); Three in Baltimore City (21213, 21202 (Penn Station), 21216).]

4. The Exemption **does not list all of the stations the D&H’s trackage rights traverse.**

5. The D&H filed its Exemption pursuant to 49 CFR 1152.50. Section 1152.50(d)(2) states that the “notice shall include the proposed consummation date, the certification required in § 1152.50(b), the information required in §§1152.22(a) (1) through (4), (7) and (8) and (e)(4).”

6. Section 1152.22(a)(8) states that applications for the discontinuance of rail service “**shall contain**” a “(8) List of all United States Postal Service ZIP Codes that the line proposed for abandonment traverses.” Bold added.

7. STB precedent requires that the heading of all discontinuance / abandonment proceedings must contain a listing of all of the counties that a line traverses.

8. STB precedent requires that a discontinuance exemption list all of the stations the line to be discontinued, traverses.

9. In *Norfolk Southern Railway Company – Abandonment Exemption – In Baltimore County, MD*, STB Docket No. AB-290 (Sub-No. 237X), Served April 3, 2006, Norfolk Southern sought to abandon its freight operating rights over a line of railroad in Baltimore City and Baltimore County, Maryland. In its exemption petition, Norfolk Southern failed to list all of the Zip Codes and all of the stations through which its line traversed. In denying Norfolk Southern' exemption, the STB stated:

“The exemption process is designed to minimize regulatory burdens. However, a prerequisite to use of the exemption process is that proper notice be given of the proposal so that all potentially interested parties are given accurate information about the scope of ‘the transaction or service’ in order to be able to challenge it. In the context of an abandonment exemption, this includes, **at a minimum**, accurately describing the parameters of the proposed abandonment, **including milepost numbers, U.S. Postal Service Zip Codes through which the line runs, and any stations on the line.** ... Nevertheless, taken as a whole, we believe that these errors or inconsistencies constitute ineffective notice of the proposed abandonment. Therefore, we will deny NSR’s petition, without prejudice to refiling.” Slip op. At 3. Bold added.

“As the petitioner, NSR has the burden to provide the Board with a complete and accurate record as to what is proposed to be abandoned. NSR also has an obligation to provide the public with accurate information about its proposal to ensure that all potentially interested parties and members of the general public have proper notice and the opportunity to participate in the Board’s proceeding. Given the incorrect identification of the line’s ending milepost in NSR’s petition, and the unresolved questions regarding NSR’s identification of the Zip Codes and stations that would be affected by the proposed abandonment, we are concerned that all interested parties and communities may not have received adequate notice of this proposed abandonment. Therefore, it would be inappropriate to go forward with this proceeding.” Slip op. at 4.

10. Since the Exemption omits two counties in its heading, omits at least **nineteen** Zip Codes the lines traverse, and omits nearly all of the stations that the lines traverse, the STB, per its precedent, must deny / reject / revoke the Exemption, (without prejudice to refiling a corrected exemption).

11. Below is a detailed analysis of seven of the counties, and one major city, that the D&H lines traverse. The Exemption did list all of the Zip Codes in Cecil, Anne Arundel and Prince Georges counties, Maryland. Riffin did not analyze any of the counties in Pennsylvania and New York, due to a lack of detailed street maps for those counties. Riffin did note that a Virginia Zip Code (22205) may also have been omitted. (If the D&H's trackage rights terminate within the City of Alexandria, then Zip Code 22205, for the City of Alexandria, should be included. Potomac yard was located in both Alexandria County and the City of Alexandria.)

ABANDONMENTS

12. In the D&H's Exemption, the D&H failed to note that the D&H has lines of railroad in its Oak Island, NJ, and Bethlehem, PA, yards.

13. Upon information and belief, the D&H has the **exclusive** right, and is the **exclusive** common carrier, in that portion of the former Lehigh Valley Railroad's Oak Island, NJ yard, that is used exclusively by the D&H. The D&H's portion of the Oak Island Yard, contains about 8 acres. The D&H's portion of the Oak Island Yard was used to serve multiple shippers. The use of a track segment to service multiple shippers along a track segment, renders that track segment a 'line of railroad.'

14. Since one or more of the tracks within the portion of the Oak Island Yard used exclusively by the D&H, is a 'line of railroad,' it is not appropriate to use a 'discontinuance of trackage rights' proceeding to effect the 'abandonment of a line of railroad.'

15. The D&H may have had the exclusive common carrier rights and obligations in portions of the Elizabethport and Greenville, NJ, yards, in a portion of the Bethlehem, PA yard, and in a portion of the CNJ's freight yard, in the vicinity of MP 1.7 on the CNJ Main Line.

16. Riffin has served a discovery request upon the D&H, asking that the D&H provide Riffin with documentation denoting its rights, and shippers previously served, in the above yards.

COUNTIES – ZIP CODES

17. In Exhibit B, Subject Trackage Rights, in Paragraph IV, the Exemption states that some of the subject trackage rights are over the former Lehigh Valley Railroad lines, between Oak Island, NJ, MP 6.5, and Freemansburg, PA, MP 85.8.

18. Appended as **Exhibit One**, are a number of detailed street maps which depict the location of the **Lehigh Valley Line** (“LVRR”) as it passes through the counties of **Hudson, Middlesex**, Somerset, Hunterdon and Warren, all located in NJ. These maps also depict the Zip Codes for the areas that the Lehigh Valley line passes through.

19. Appended as **Exhibit One**, are a number of detailed street maps which depict the location of the **Central of New Jersey Line** (“CNJ”) as it passes through the counties of **Hudson, Middlesex**, Somerset, Hunterdon and Warren, all located in NJ. These maps also depict the Zip Codes for the areas that the CNJ Line passes through.

HUDSON COUNTY, NJ

20. The Exemption is missing Hudson County in its heading, and is missing Hudson County Zip Codes: **07302, 07304, and 07305**.

21. The Hudson County Maps depict the locations of the CNJ and the LVRR, as they traverse Hudson County, NJ.

22. Since the Exemption states that the D&H’s trackage rights on the LVRR **begin at MP 6.5, Oak Island, NJ**, which is located in **Union County, NJ**, no portion of the D&H’s trackage rights on the LVRR are located in Hudson County, NJ. [This caveat is subject to verification by looking at the actual trackage rights agreements, to verify that the trackage rights begin at MP 6.5, rather than somewhere between MP 0.0 and MP 6.5. (MP 0.0 to MP about 5.8 are located in

Hudson County, NJ.)]

23. **MP 0.0 on the CNJ Main Line** is the Passenger Terminal, which is in the Northeast quadrant of today's Liberty State Park. MP 1.0 on the CNJ is near the former CNJ round house, which is where the present day Science Center is located.

24. The CNJ track maps indicate that the CNJ main line split into a freight component, and a passenger component, in the vicinity of MP 3.0, which is located a bit south of **Chapel Avenue**.

25. **Caven Point Road** is located at MP 1.97. Aerial maps indicate that the freight main entered the CNJ freight yard a bit north of **Thomas McGovern Drive**, which is located on the south side of Liberty State Park. See NJ Map 40 (Hudson County Map 1).

26. The end point of the D&H's CNJ's trackage rights is at MP 1.72, which is 0.25 miles (1,320 feet) north of where the CNJ Main Line crossed **Caven Point Road**. That would put MP 1.72 in the south end of CNJ's freight yard, or somewhere in the south end of what is depicted today as Liberty State Park.

27. NJ Maps 40, 41, 43 and 44 depict the location of the CNJ Main Line as it traverses Hudson County, and depict the Zip Codes that the CNJ Main Line traverses in Hudson County.

28. The Exemption **does not list Hudson County** as a county through which D&H's trackage rights traverse.

29. The Exemption **does not list** the three Zip Codes in Hudson County through which the trackage rights traverse, namely Zip Codes: **07304, 07305, 07302**.

MIDDLESEX COUNTY, NJ

30. The Exemption is missing Middlesex County in its heading, and is missing Middlesex County Zip Codes: **07061, 07080 and 08820**.

31. The Middlesex County maps depicts the **Lehigh Valley Line** passing through **Middlesex County, NJ**, through Zip Codes:

A. **08846** (NJ Map 34: Middlesex / Piscataway – Middlesex Map 1 - Left)

B. **07080** (NJ Map 37: South Plainfield – Middlesex Map 1 - Right)

C. **08820** (NJ Map 38: Edison Township – Middlesex Map 2 - Left)

32. The county of **Middlesex, NJ is not listed** in the Exemption heading.

33. Zip Codes **07080** (South Plainfield), and **08820** (Edison Township) **are not listed** in the NJ Zip Codes listed on p. 4 of the Exemption.

34. The Middlesex County map depicts the **CNJ Line** passing through **Middlesex County, NJ**, through Zip Codes:

A. **08846** (NJ Map 34: Middlesex / Piscataway, – Middlesex Map 1 - Left)

B. **08812** (NJ Map 34: Dunellen, Middlesex County – Middlesex Map 1 - Left)

C. **07061** (NJ Map 35: Plainfield, Union County – Somerset Map 8 - Right)

D. **07062** (NJ Map 35: Plainfield, Union County – Somerset Map 8 - Right)

35. The county of **Middlesex**, NJ **is not listed** in the Exemption heading.

36. Zip Code **07061** (Plainfield), **is not listed** in the NJ Zip Codes listed on p. 4 of the Exemption.

SOMERSET COUNTY, NJ

37. Both the LVRR and the CNJ pass through Somerset County, NJ.

38. The following Somerset County Zip Codes, through which the LVRR / CNJ traverse, **are not listed** in the Exemption:

LVRR: **08821** (Flagtown – NJ Maps 28, 29), **08876** (Hillsborough – NJ Map 29).

CNJ: **08869** (Raritan – NJ Map 19),

HUNTERDON COUNTY, NJ

39. Both the LVRR and the CNJ pass through Hunterdon County, NJ.

40. The following Hunterdon County Zip Codes, through which the LVRR / CNJ traverse, **are not listed** in the Exemption:

CNJ: **08826** (Glen Gardner – NJ Map 12), **08829** (High Bridge – NJ Map 13)

CNJ: **08833** (Lebanon – NJ Map 14) **08889** (Readington – NJ Maps 16, 17)

HARFORD COUNTY, MD

41. The Harrisburg to Perryville, MD to Baltimore, MD, to Washington, DC, to Alexandria, VA line traverses Cecil, Harford, Baltimore, Anne Arundel and Prince Georges counties, MD, Baltimore City, DC and the county of Alexandria, VA.

42. Two Zip Codes in Harford County, MD were omitted: **21085** (Joppatown – MD Map 5) and **21101** (Magnolia – MD Map 5).

BALTIMORE COUNTY, MD

43. One Zip Code was omitted in Baltimore County: **21027** (Chase – MD Map 4).

BALTIMORE CITY, MD

44. Three Zip Codes were omitted in Baltimore City: **21213** (MD Map 2), **21202** (Penn Station – MD Map 2) and **21216** (MD Map 1).

45. I certify under the penalties of perjury, that the above is true and correct to the best of my personal knowledge, information and belief.

James Riffin
P.O. Box 4044
Timonium, MD 21094
(443) 414-6210

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of April, 2015, a copy of the foregoing Petition to Revoke, was served on the parties noted below, by E-mail. A hard copy was also mailed via first class mail, to Karl Hansen, Stinson Leonard Street LLP, Suite 2300, 150 S. Fifth Street, Minneapolis, MN 55402, counsel for the D&H.

James Riffin

E-mail:

D&H Railways:	Karl Hansen:	karl.hansen@stinsonleonard.com
D&H Railways:	David Rifkind:	david.rifkind@stinsonleonard.com

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**DELAWARE AND HUDSON RAILWAY COMPANY, INC. --
DISCONTINUANCE OF TRACKAGE RIGHTS EXEMPTION --
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EXHIBIT ONE TO

MOTION / PETITION TO REJECT / REVOKE

D & H'S DISCONTINUANCE OF TRACKAGE RIGHTS EXEMPTION

MAPS SHOWING ZIP CODES LINES OF CNJ AND LVRR

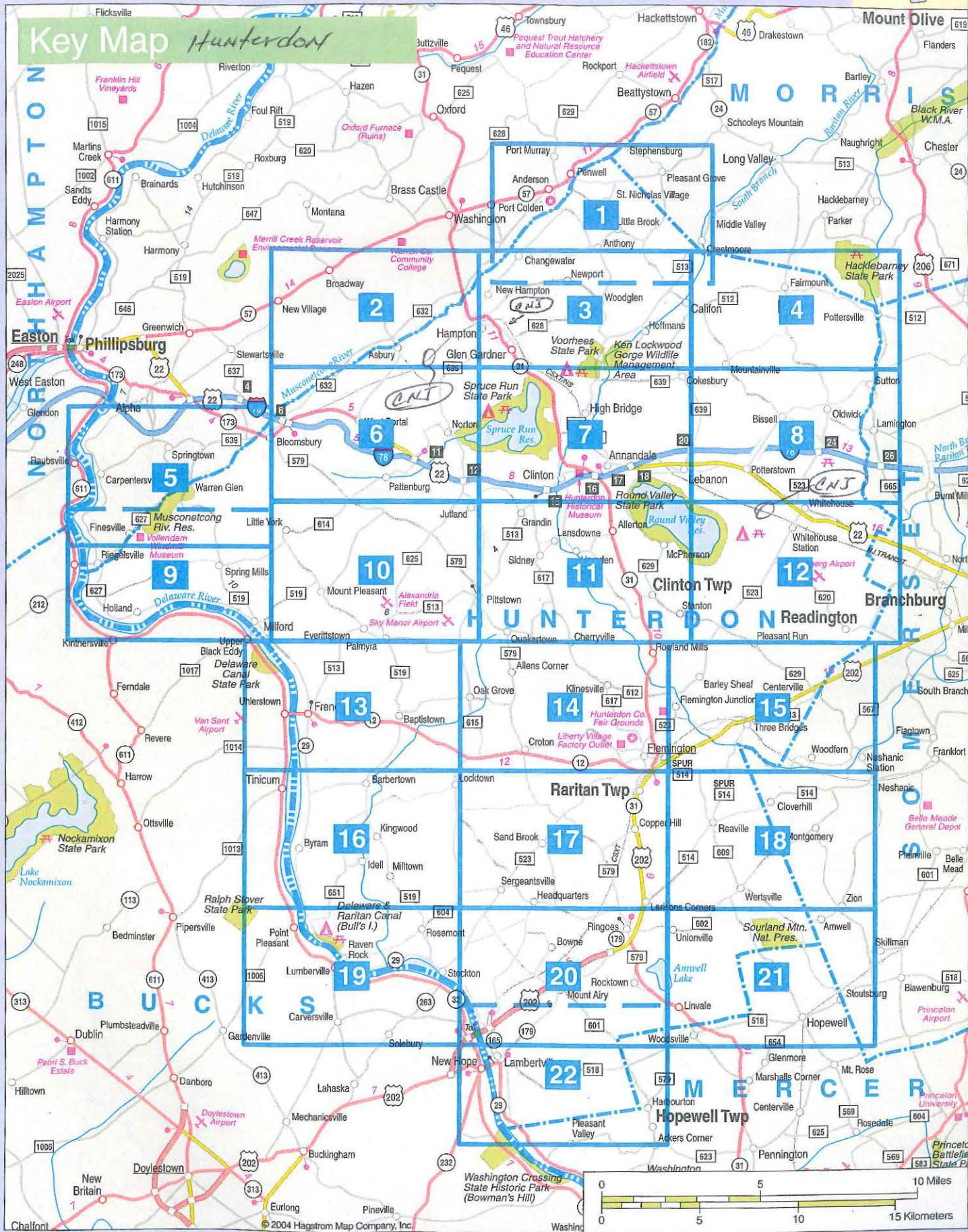
PASS THROUGH IN NJ COUNTIES OF

WARREN, HUNTERDON, SOMERSET, MIDDLESEX, HUDSON

Filed by:

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Timonium, MD 21094
(443) 414-6210

Key Map *Hunterdon*



(E)

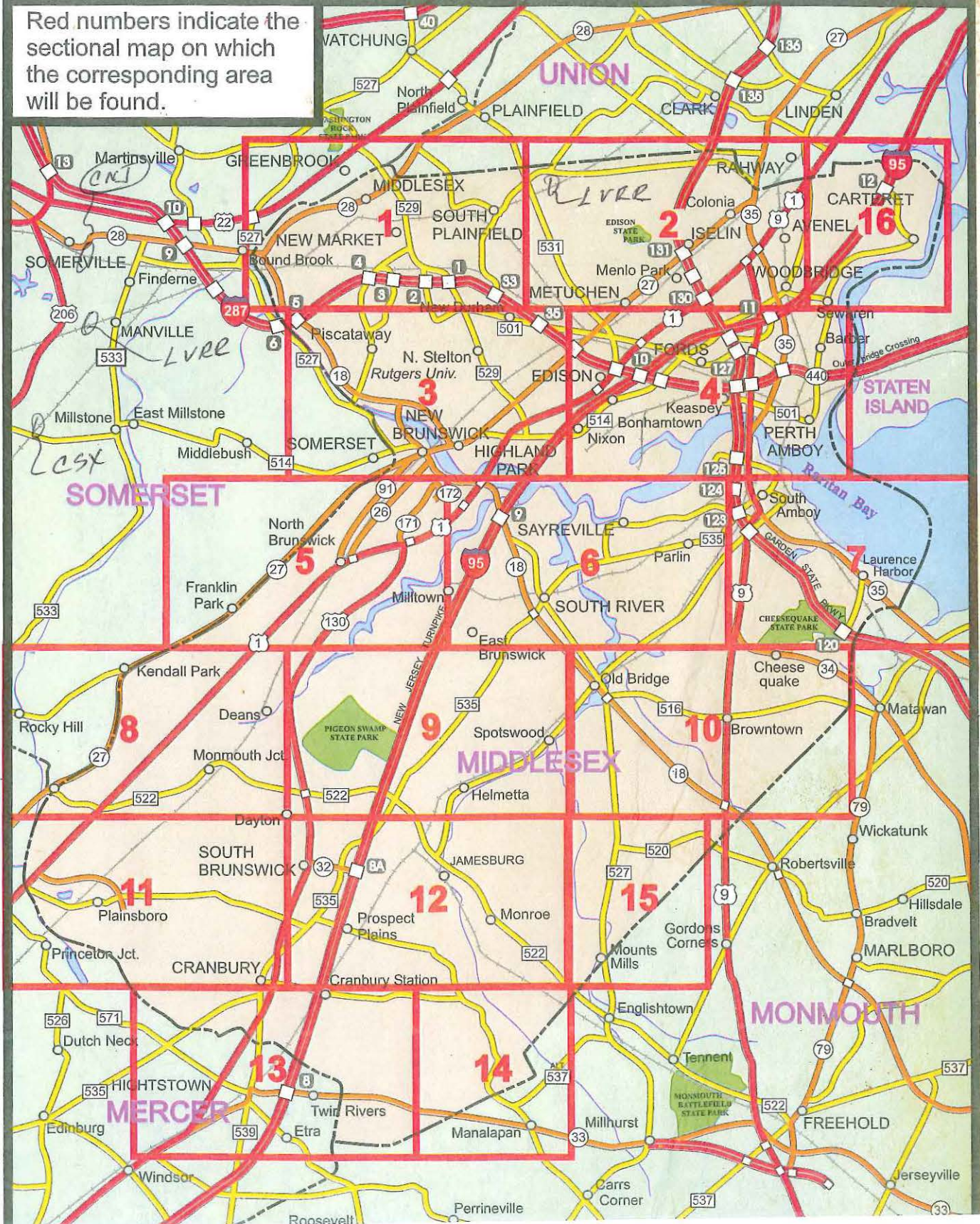
Key Map - Somerset



MIDDLESEX COUNTY

PageFinder Map

Red numbers indicate the sectional map on which the corresponding area will be found.



51
52
53
54
55
56
57
58
59
60
61



Phillipsburg
0 0.25 0.50 Mile
One inch equals 0.49 mile.
© 2006, Rand McNally

Hunterdon Co.

For Adjoining Area See Hagstrom's Morris/Sussex/Warren Counties Atlas



LVRR

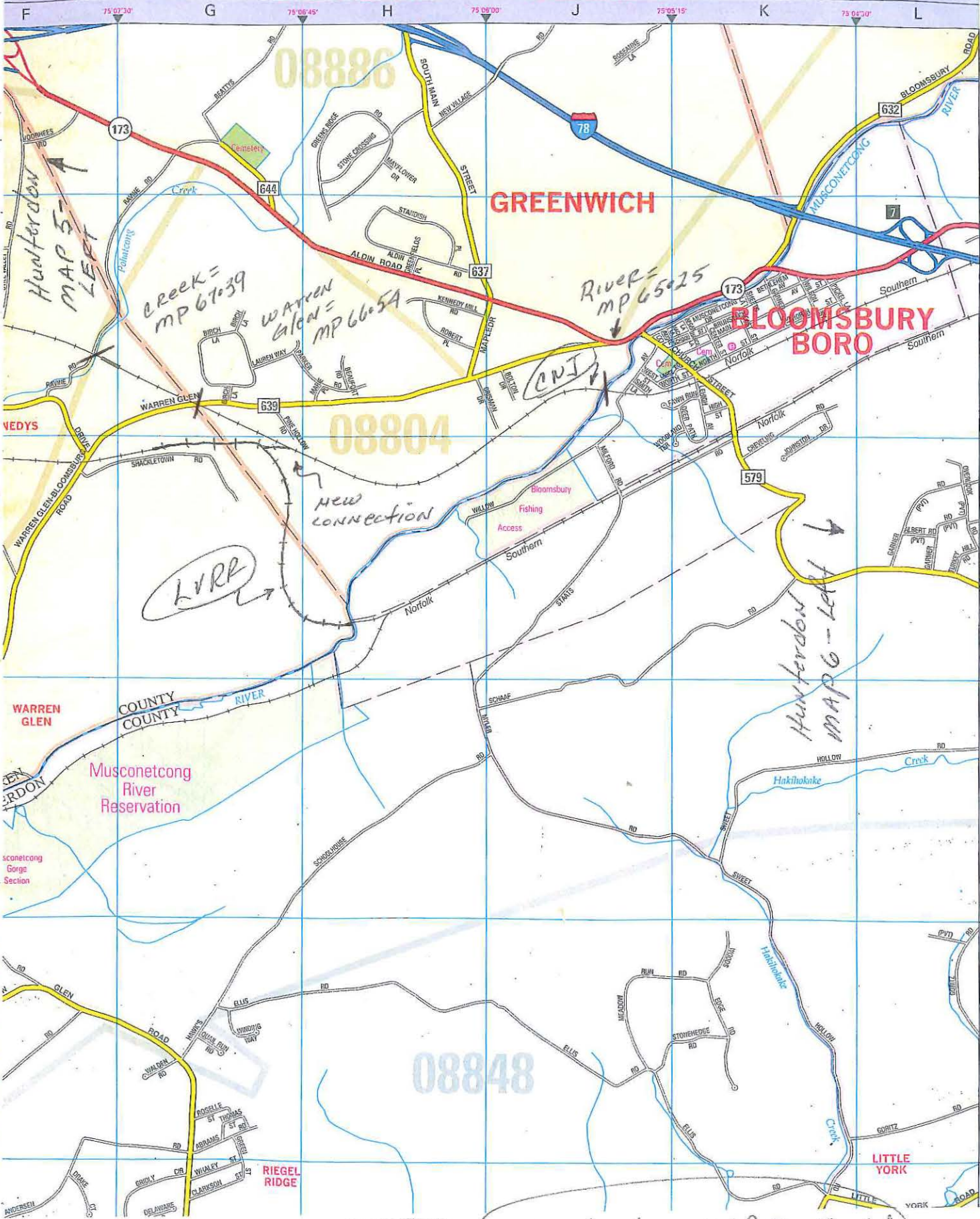
CNS

7

Each grid box represents approximately 0.65 mi. horizontally by 0.66 mi. vertically.

Scale 1:24,000
0 1,000 2,000 3,000 4,000 5,000 Feet
0 200 400 600 800 1,000 1,200 1,400 Meters

For Adjoining Area See Hagstrom's Morris/Sussex/Warren Counties Atlas



LVR
CNT

Hunterdon - MAP 5 - Right

8

Hunterdon Co.

Joins Map 2

L 75°02'45" M 75°03'00" N 75°02'15" O 75°01'30" P

N

10

11

12

13

14

Joins Map 5

BLOOMSBURY BORO

BETH T

08802

08804

*Hunterdon
MAP 5 - Right*

*Hunterdon
MAP 6 - Right*

PATTENBURG

08848

Hunterdon - MAP 6 - Left

CNJ

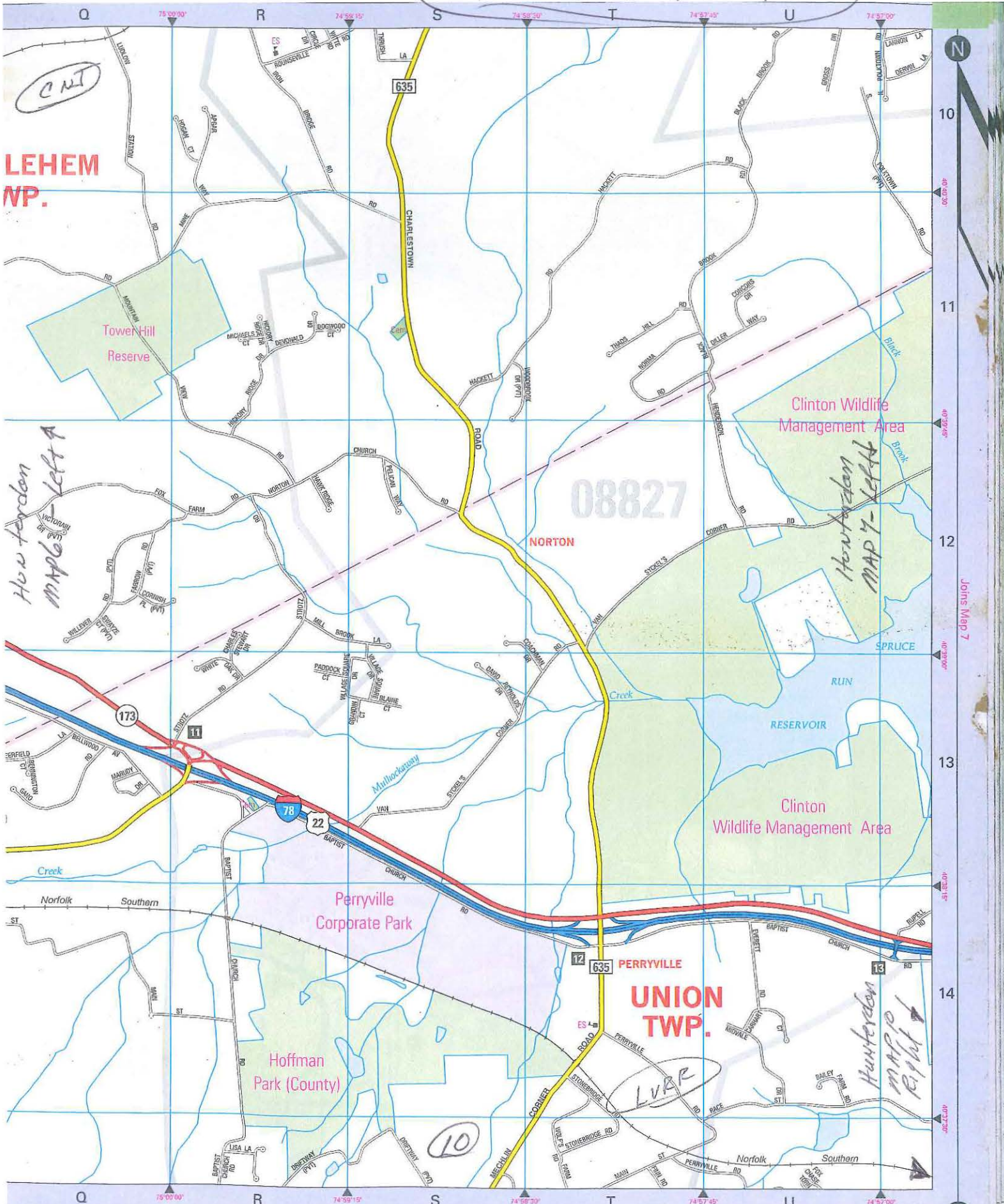
LVRR

9

Hunterdon
MAP 2-Right ↑

CNT LVRP

Hunterdon MAP 6-Right

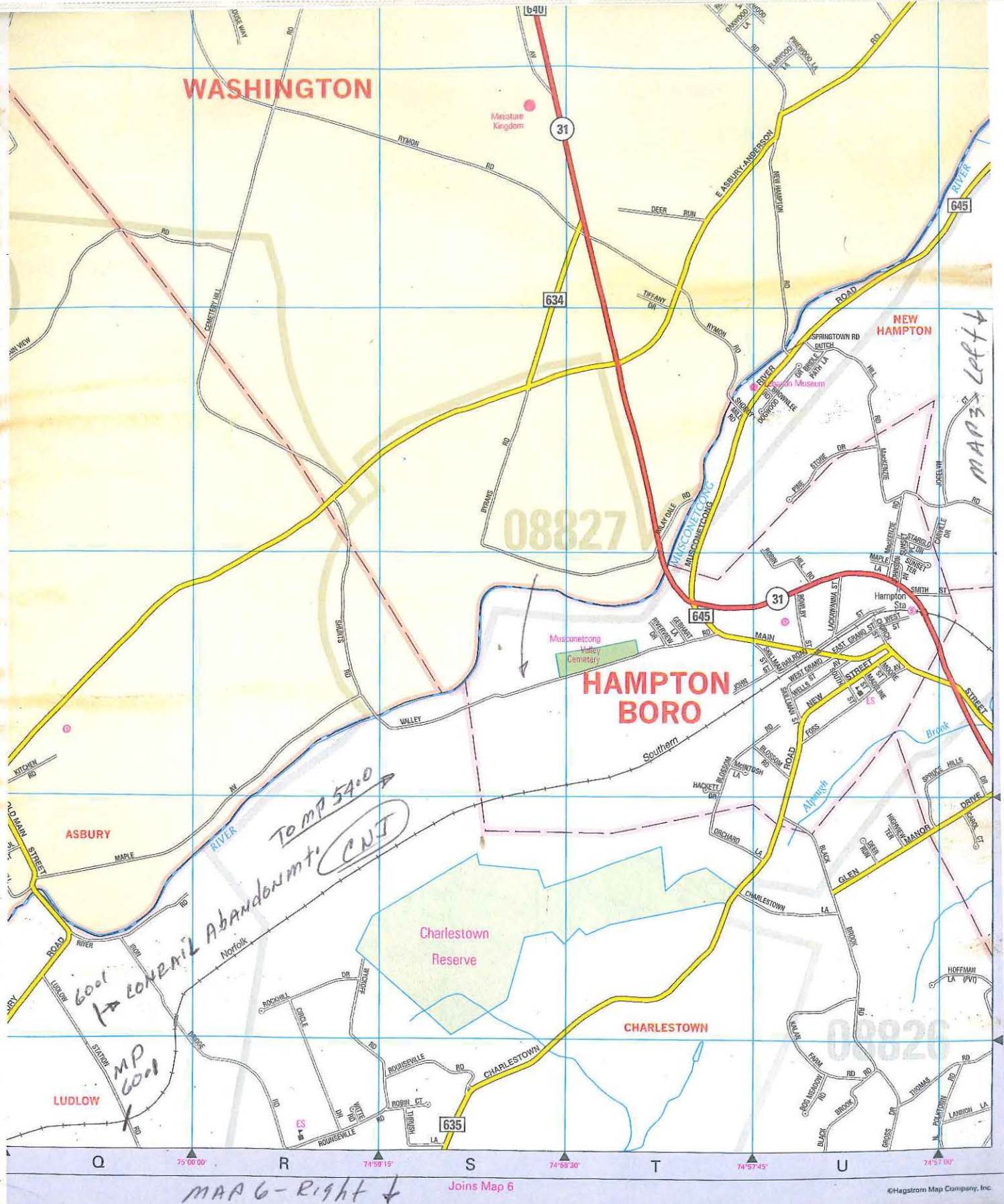


LEHEM
NP.

Hunterdon
MAP 6-Left

Hunterdon
MAP 7-Left

Hunterdon
MAP 10
Right



WASHINGTON

Ministère Kingdom

31

634

MAP 3-Left

NEW HAMPTON

08827

HAMPTON BORO

Musconetcong Valley Cemetery

Temp 54.0
Abandonmt. CNT

Charlestown Reserve

CHARLESTOWN

LUDLOW

Q

R

S

T

U

MAP 6-Right

Joins Map 6

©Hagstrom Map Company, Inc.

Hunterdon - MAP 2-Right

CNT

11

MAP 2-Right A Joins Map 2

MAP 2-Right A

56

©Hagstrom Map Company, Inc.

Joins Map 7

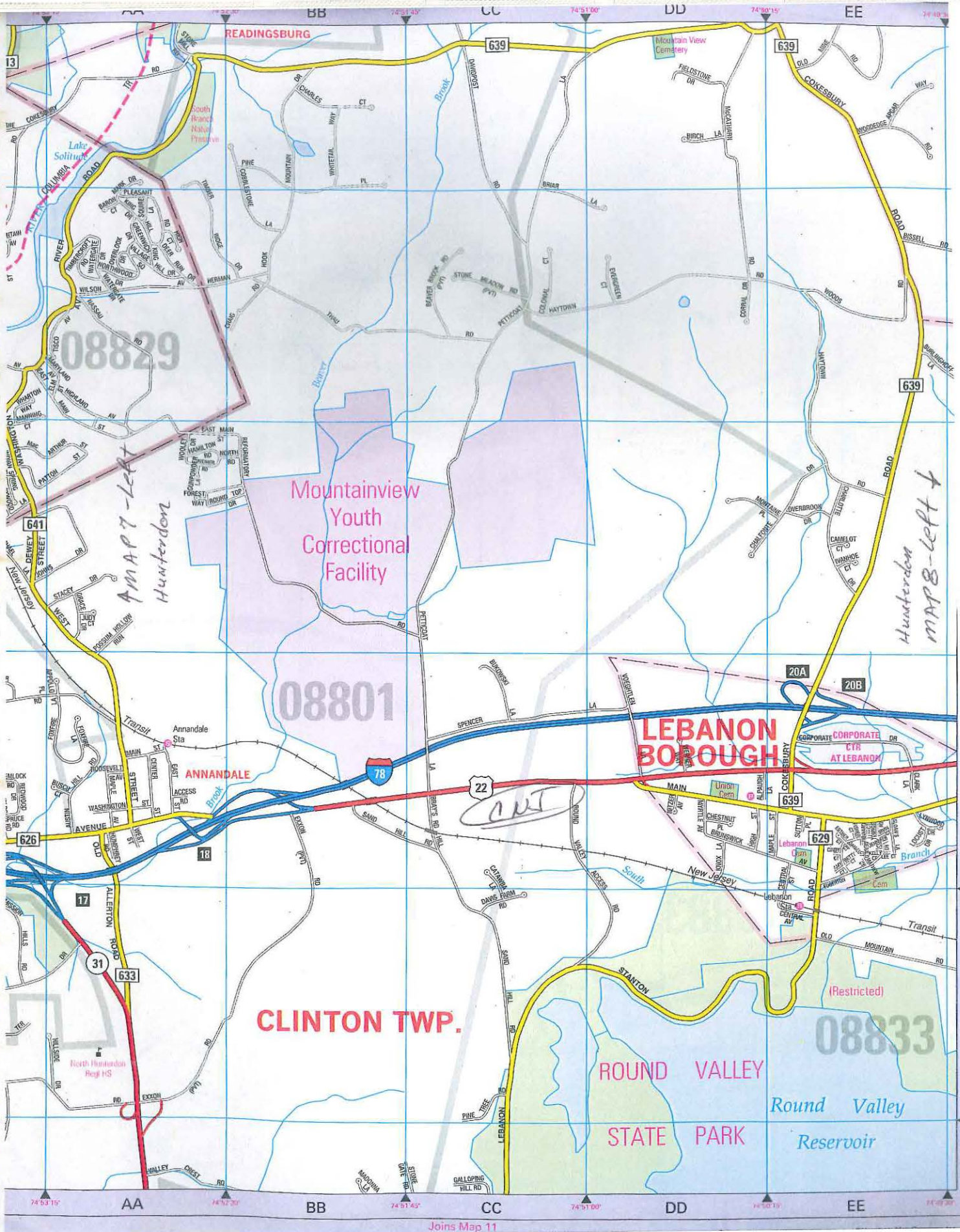
MAP 7-Left

Hunterdon MAP 3-Left

CNT

12





Hunterdon- map 7- Right

(CMT) (14)



Hunterdon MAP 7- Right + Joins Map 7

MAP 12- Left +
Hunterdon

Hunterdon- MAP 8- Left

CNT

15



Hunterdon Co.

Hunterdon MAP 8 - Left A
Joins Map 8

FF 74°48'45" GG 74°48'00" HH 74°47'15" JJ 74°46'30" KK

N

15

ROUND

VALLEY

Round Valley
Reservoir

CLINTON TWP.

STATE

PARK

08833

16

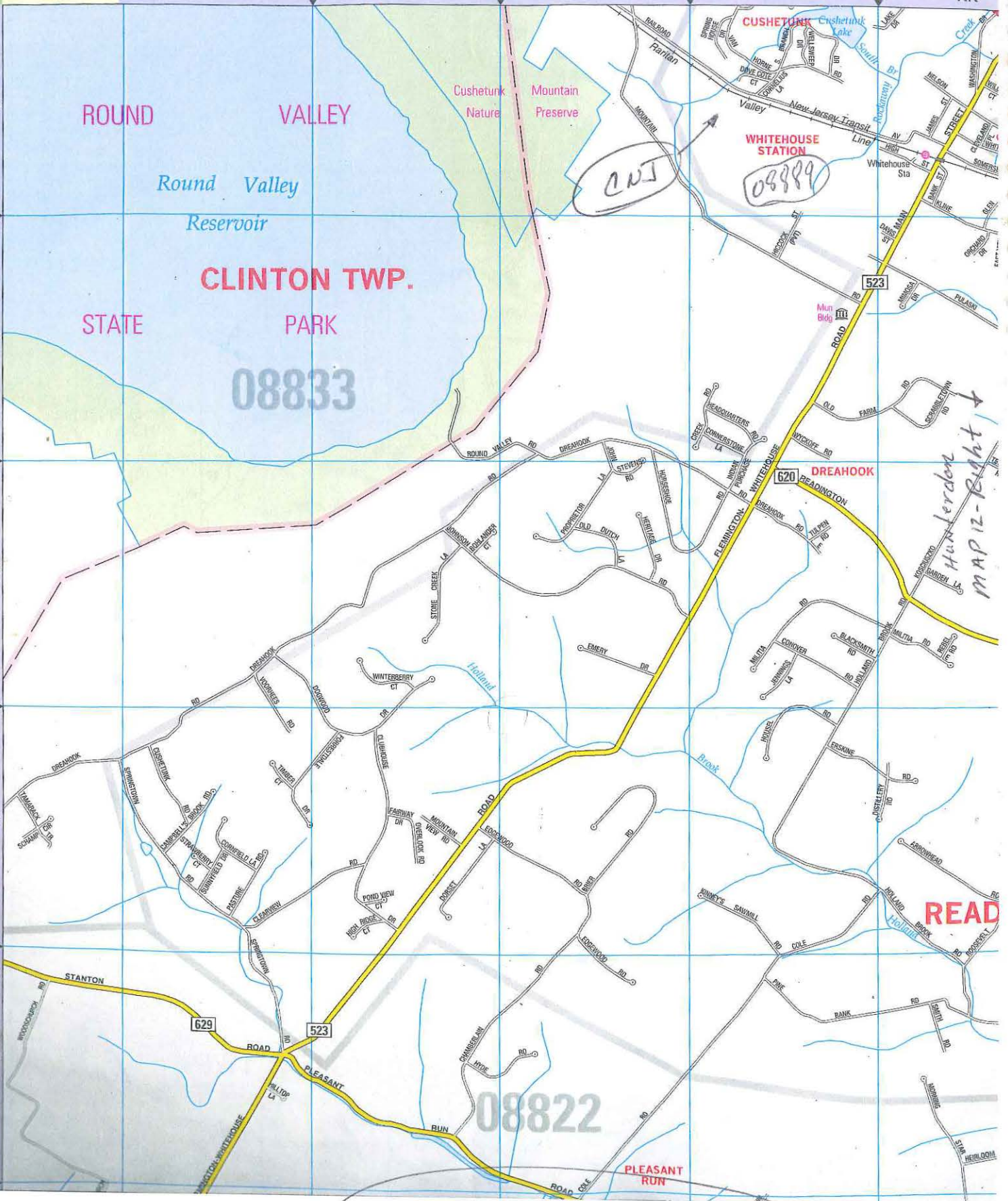
17

18

19

Joins Map 11

19



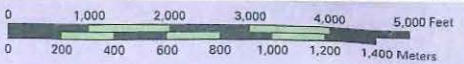
Hunterdon-MAP 12 - Left

CNT

(16)

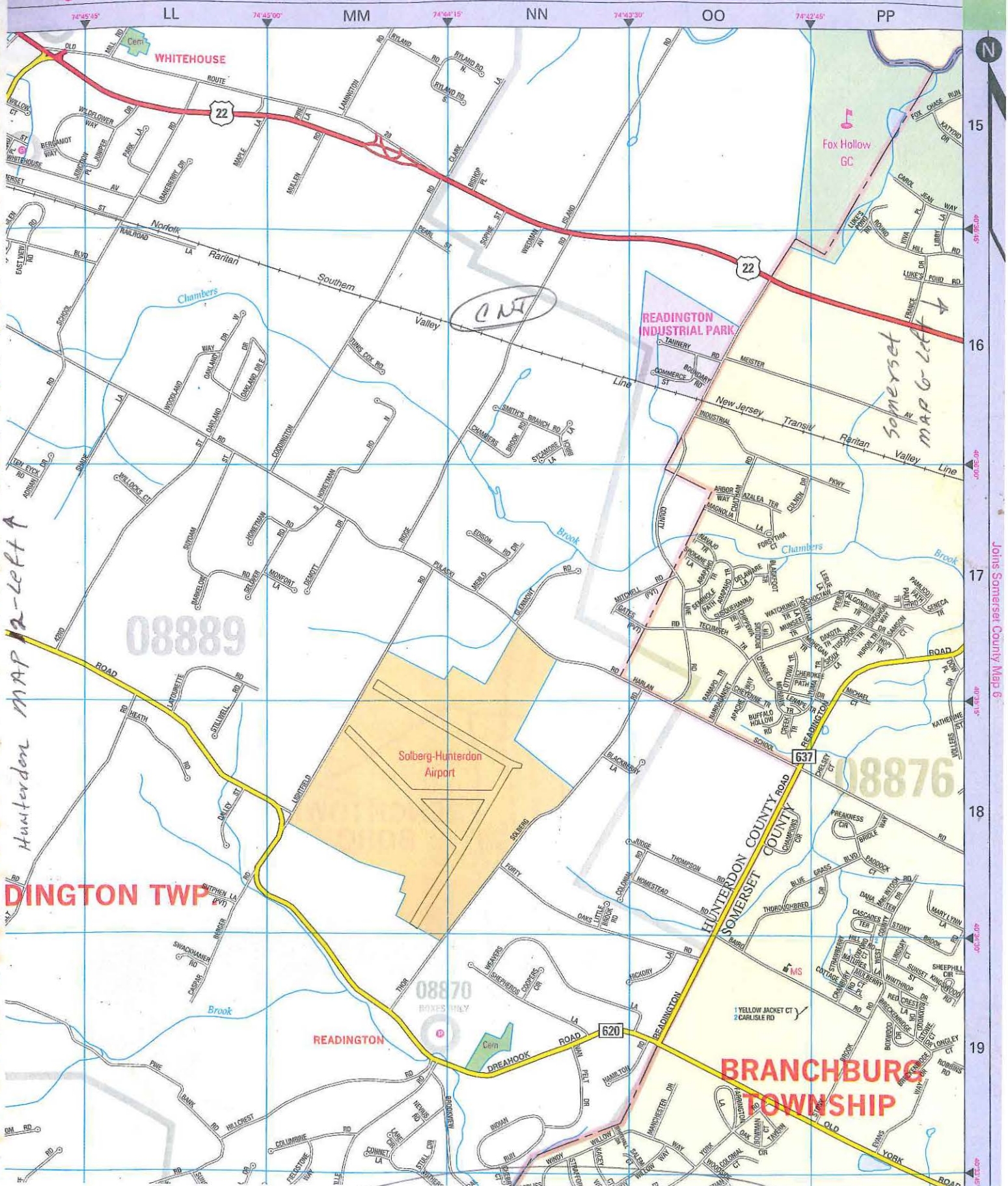
Tip Quickly estimate distance:
Each grid box represents approximately
0.65 mi. horizontally by 0.86 mi. vertically

Scale 1:24,000



12

Joins Map 8



Hunterdon - MAP 12 - Left

DINGTON TWP

08889

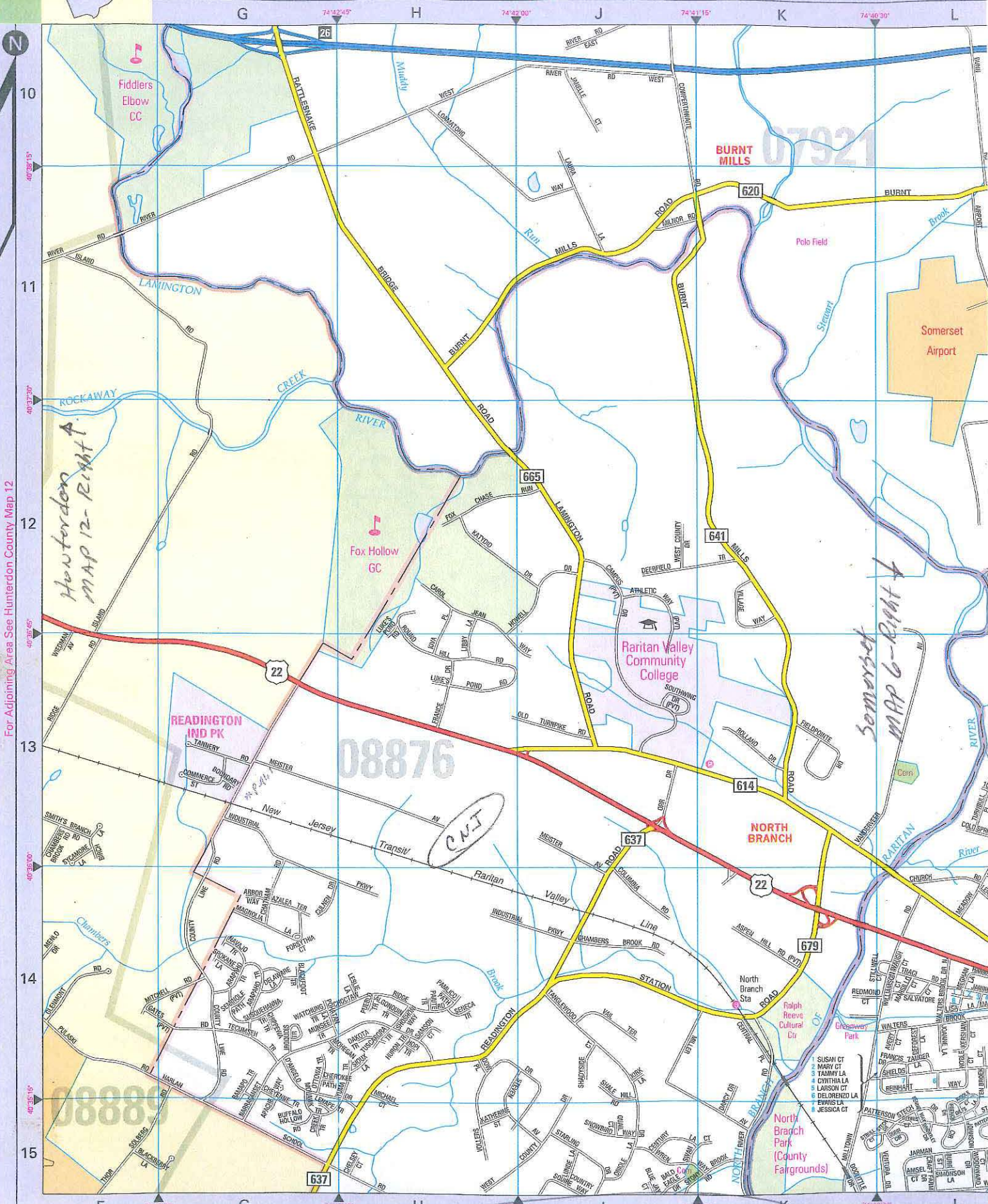
08876

08870

Hunterdon - MAP 12 - Right

C.N.T. 17

Joins Somerset County Map 6



For Adjoining Area See Hunterdon County Map 12

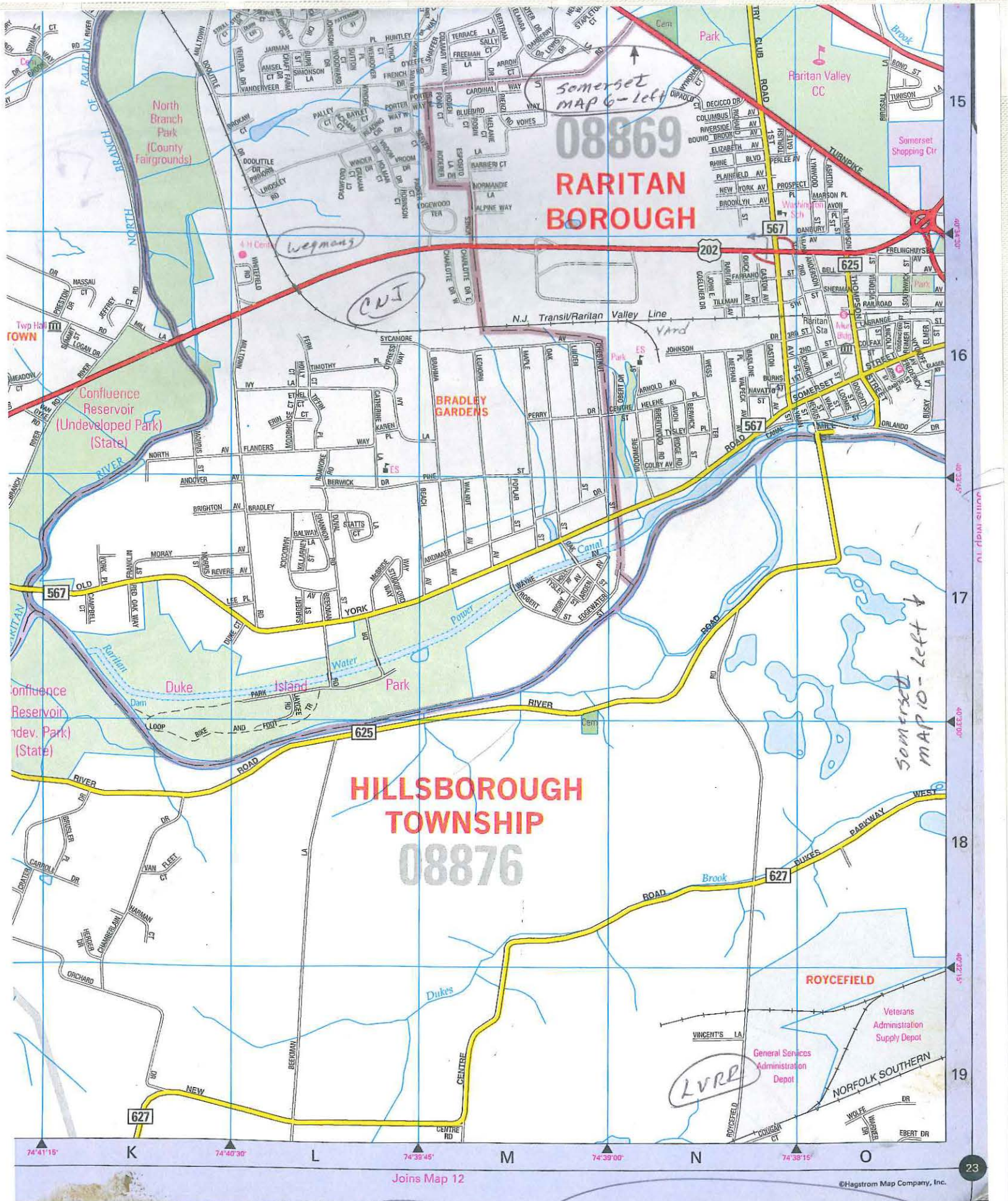
Somerset
MAP 9-Right ↓

CNJ

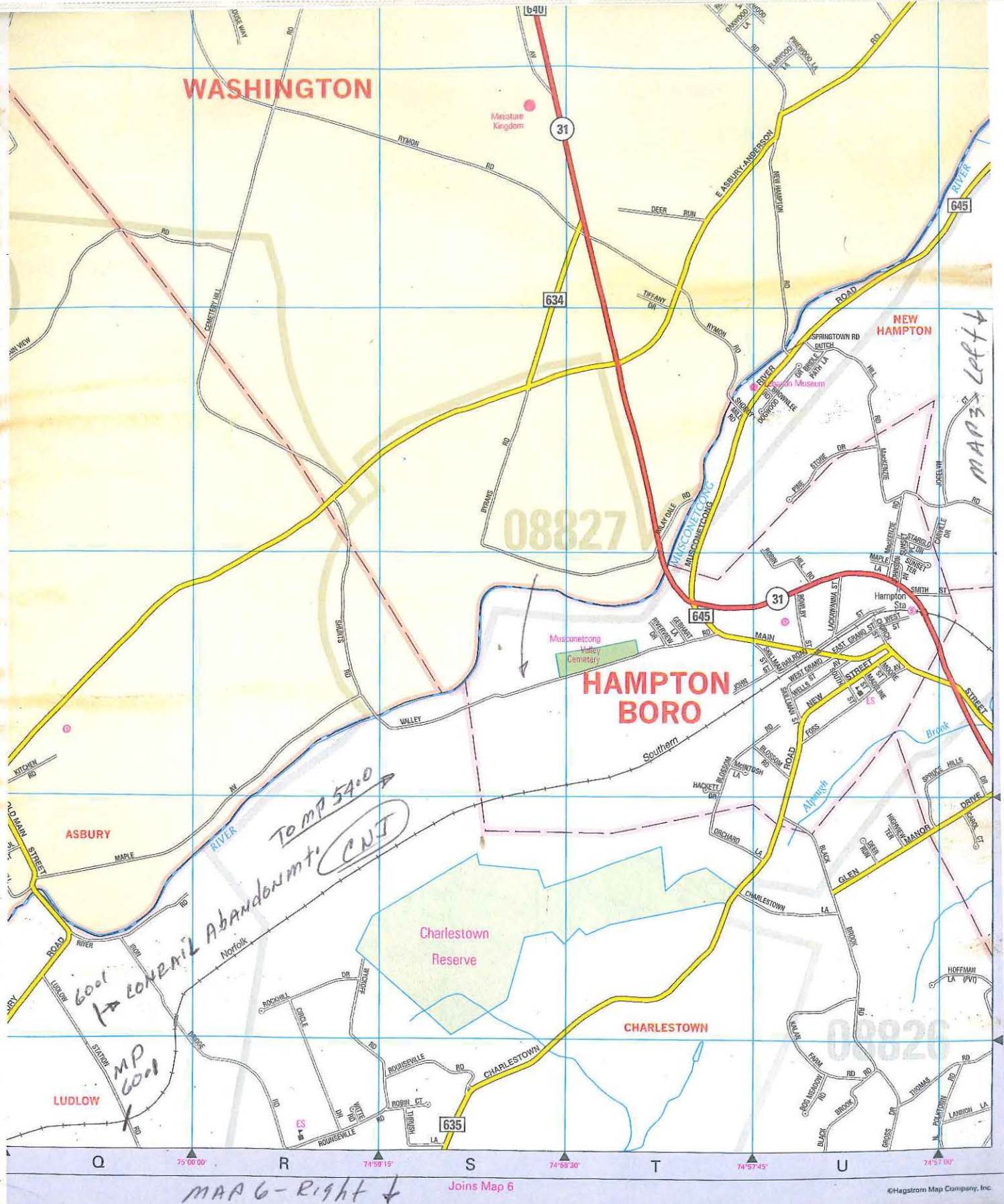
Somerset MAP 6-Left

18

08807



CNY
LVRP
19
Somerset-MAP 9-Right



WASHINGTON

Ministère Kingdom

31

634

645

NEW HAMPTON

08827

HAMPTON BORO

Musconetcong Valley Cemetery

ASBURY

RIVER

Temp 54.0
Abandonmt. CNT

Charlestown Reserve

CHARLESTOWN

LUDLOW

Q

R

S

T

U

MAP 6-Right ↓

Joins Map 6

©Hagstrom Map Company, Inc.

Hunterdon - MAP 2-Right

CNT

11

MAP 2-Right A Joins Map 2

MAP 2-Right A

56

©Hagstrom Map Company, Inc.

Joins Map 7

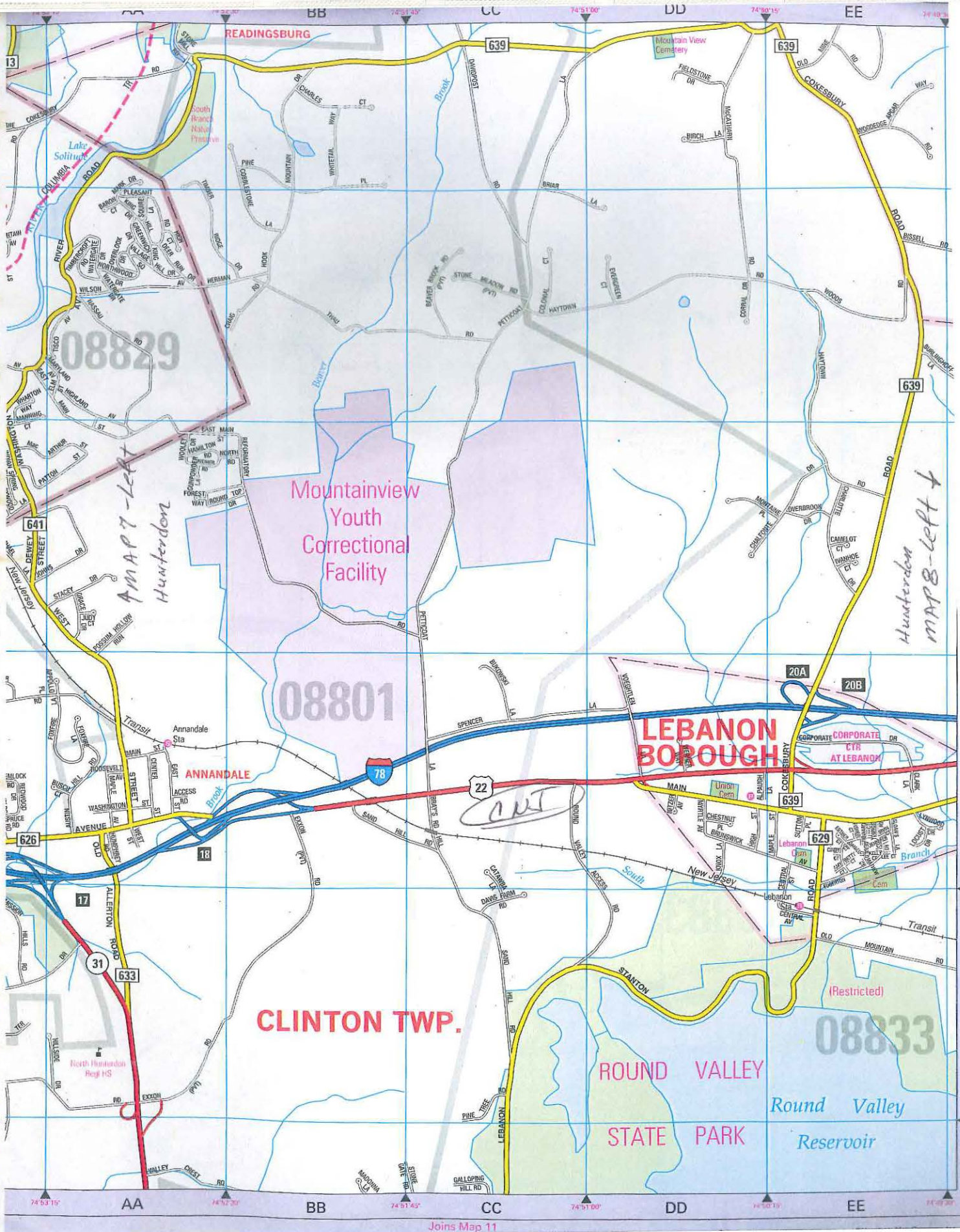
MAP 7-Left

Hunterdon MAP 3-Left

CNT

12





Hunterdon- map 7- Right

CMT 14



MAP 12- Left &
Hunterdon

Hunterdon- map 8- left

CNT

15



Hunterdon Co.

Hunterdon MAP 8 - Left A
Joins Map 8

FF 74°48'45" GG 74°48'00" HH 74°47'15" JJ 74°46'30" KK

N

15

ROUND

VALLEY

Round Valley
Reservoir

CLINTON TWP.

STATE

PARK

08833

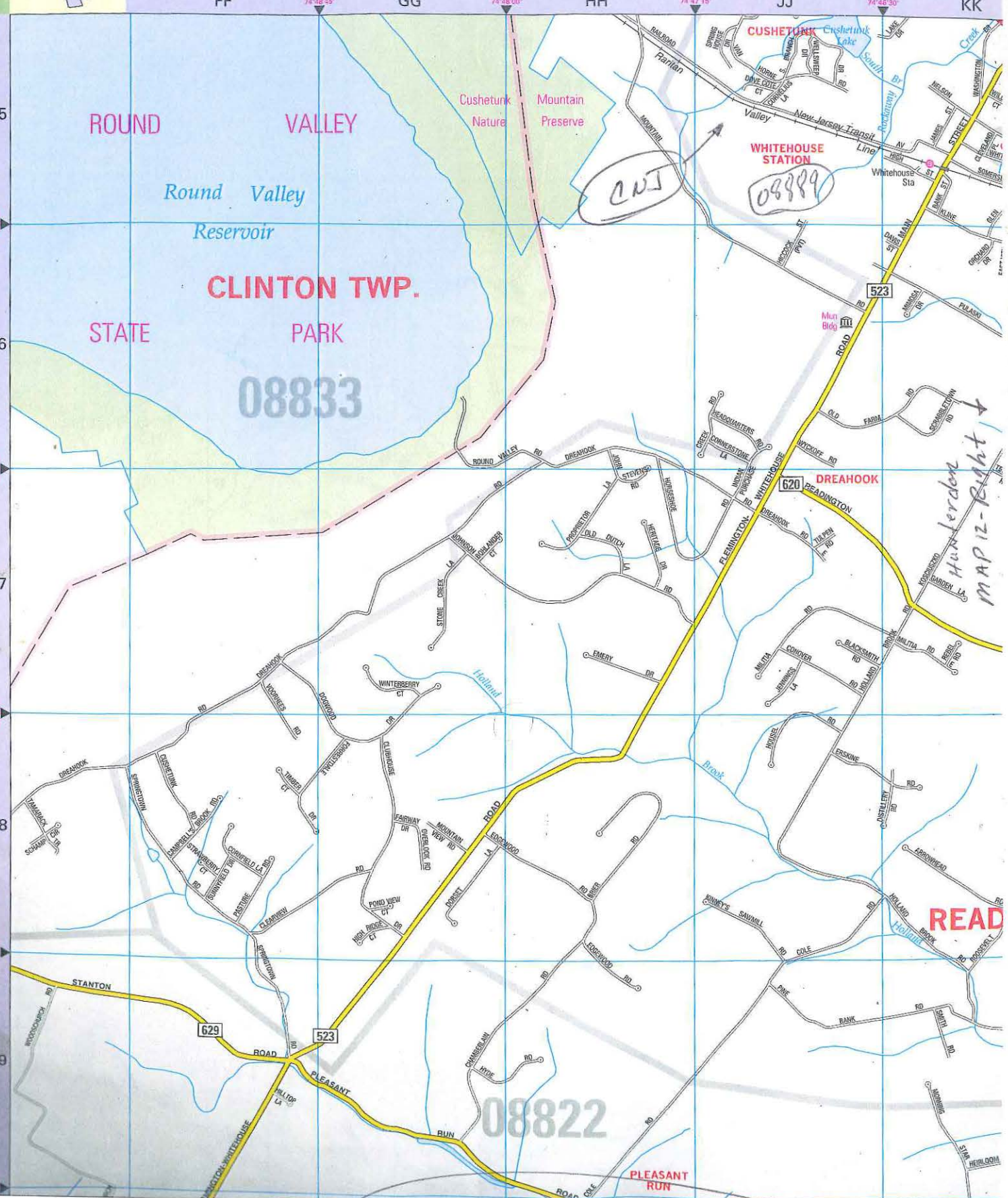
16

17

18

19

Joins Map 11



*Hunterdon
MAP 12 - Right*

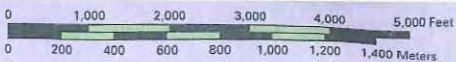
Hunterdon - MAP 12 - Left

CNY

(16)

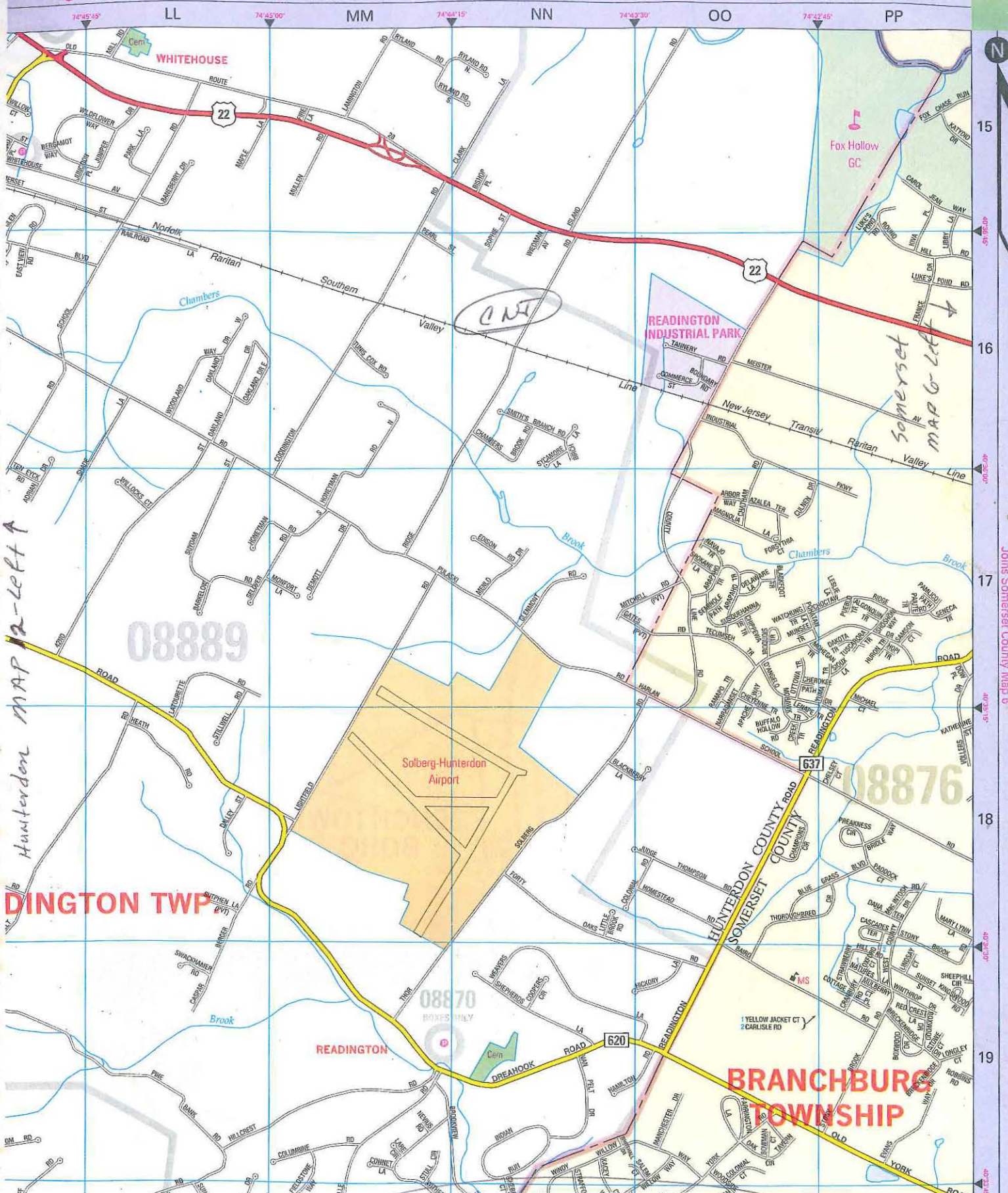
Tip Quickly estimate distance:
Each grid box represents approximately
0.65 mi. horizontally by 0.86 mi. vertically

Scale 1:24,000



12

Joins Map 8



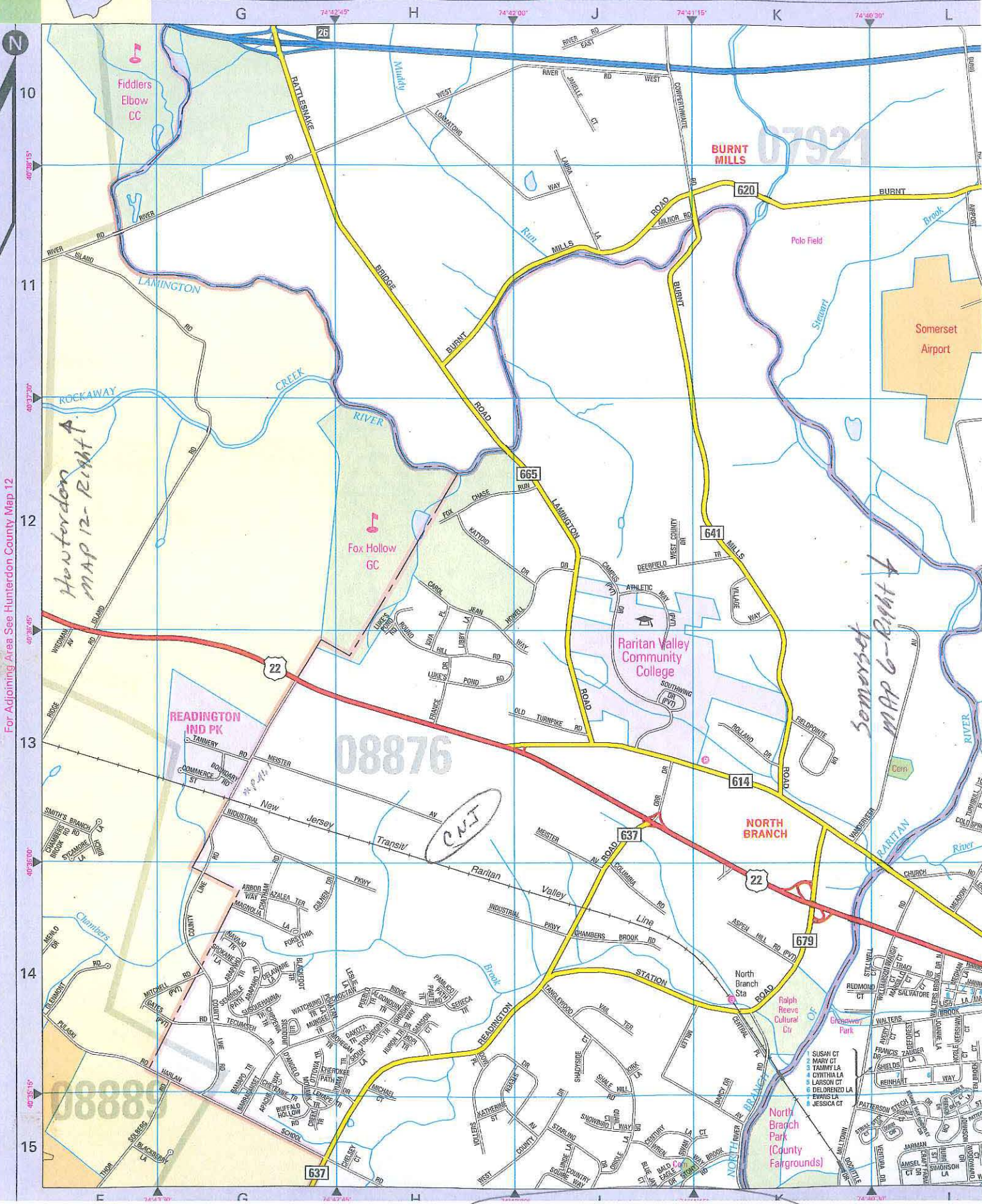
Hunterdon MAP 12-left

Somerset
MAP 6-left

READINGTON TWP

BRANCHBURG
TOWNSHIP

Hunterdon-MAP 12-Right
C.N.T. 17



For Adjoining Area See Hunterdon County Map 12

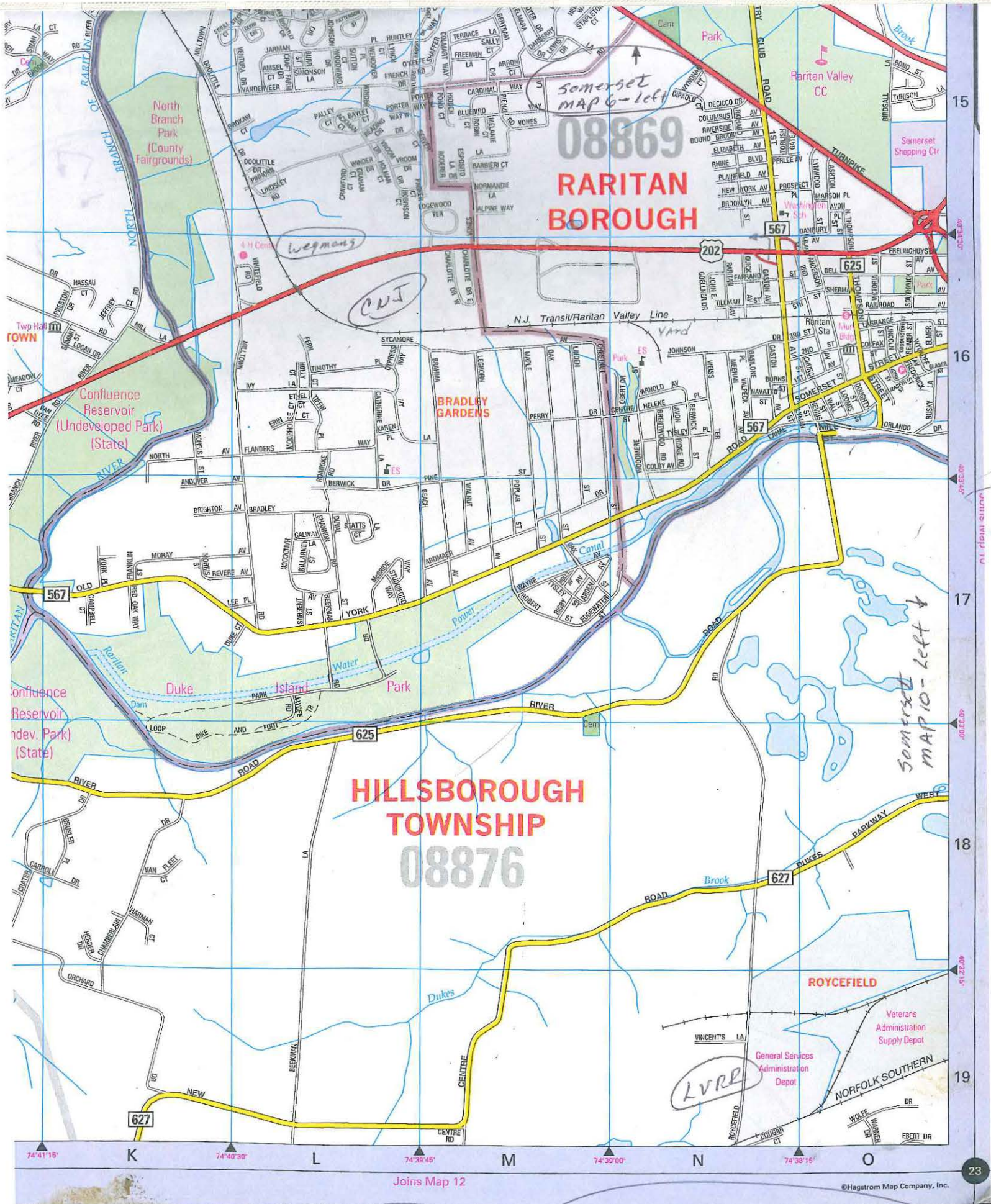
Somerset
MAP 9-Right ↓

CNS

Somerset MAP 6-Left

18

08807



CNY
LVRP
19
Somerset-MAP 9-Right

LVRR: BLOOMSBURY TO MANVILLE

(HUNTERDON)	(SOMERSET)
(MAP 6 - RIGHT)	(MAP 10 - LEFT)

ZIP CODES: 08827 08867 08801 08833 08822 08853 08821

08876 08835

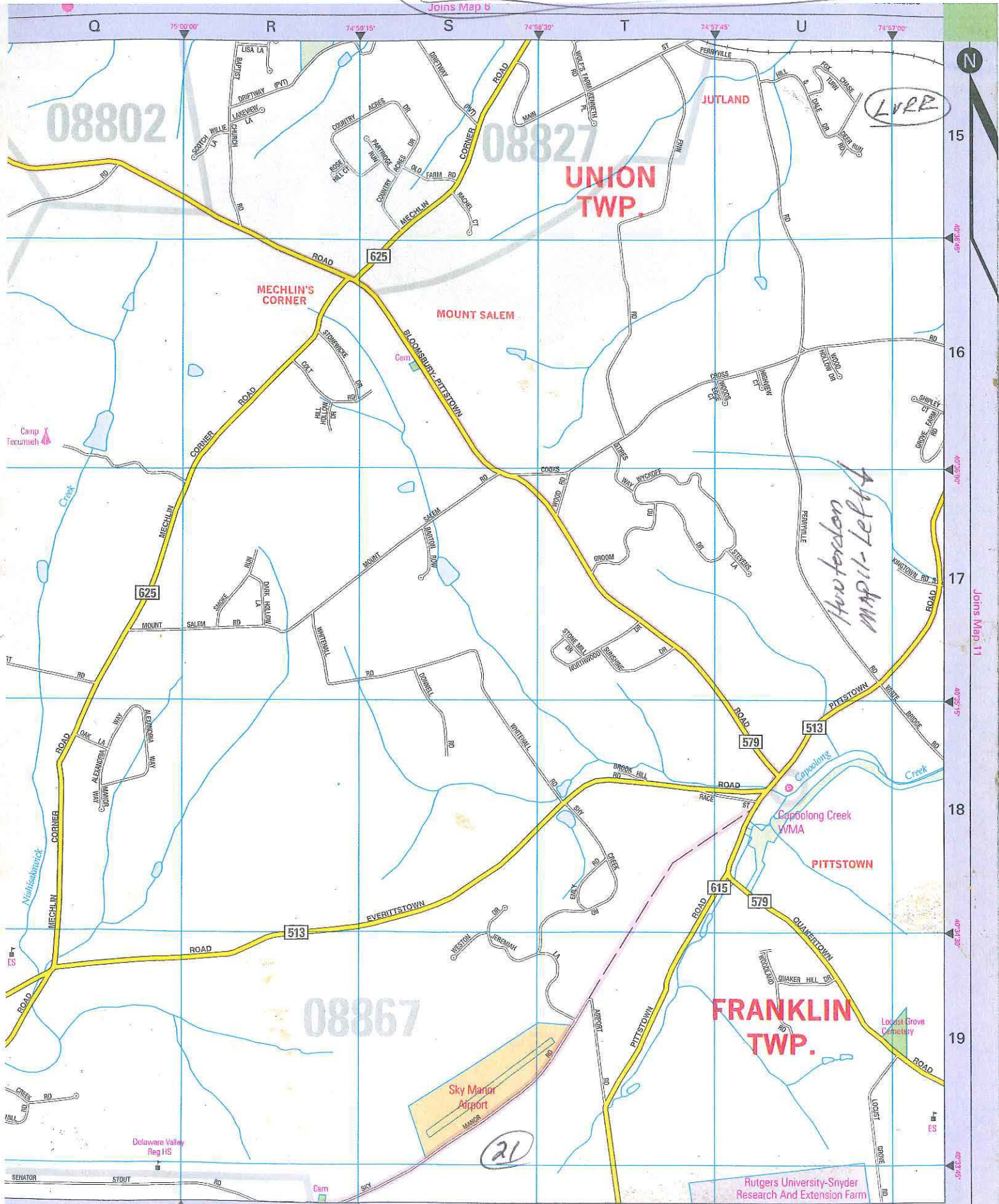
Hunterdon
map 6 - Right ↑

LVRP

Hunterdon map 10 - Right

Joins Map 6

LVRP



Joins Map 11

21

Hunterdon Co.

Joins Map 7

V

74°50'15"

W

74°55'30"

X

74°54'45"

Y

74°54'00"

Z

N

15

40°28'45"

16

40°32'00"

17

40°35'15"

18

40°33'30"

19

40°33'45"

Joins Map 10

Hunterdon
MAP 10-Right

Hunterdon
MAP 11-Right

LVR

Hunterdon map 11-Left

22

UNION
TWP.

GRANDIN

LVR

08801

08867

FRANKLIN
TWP.

08868
ROCK'S ONLY

QUAKERTOWN

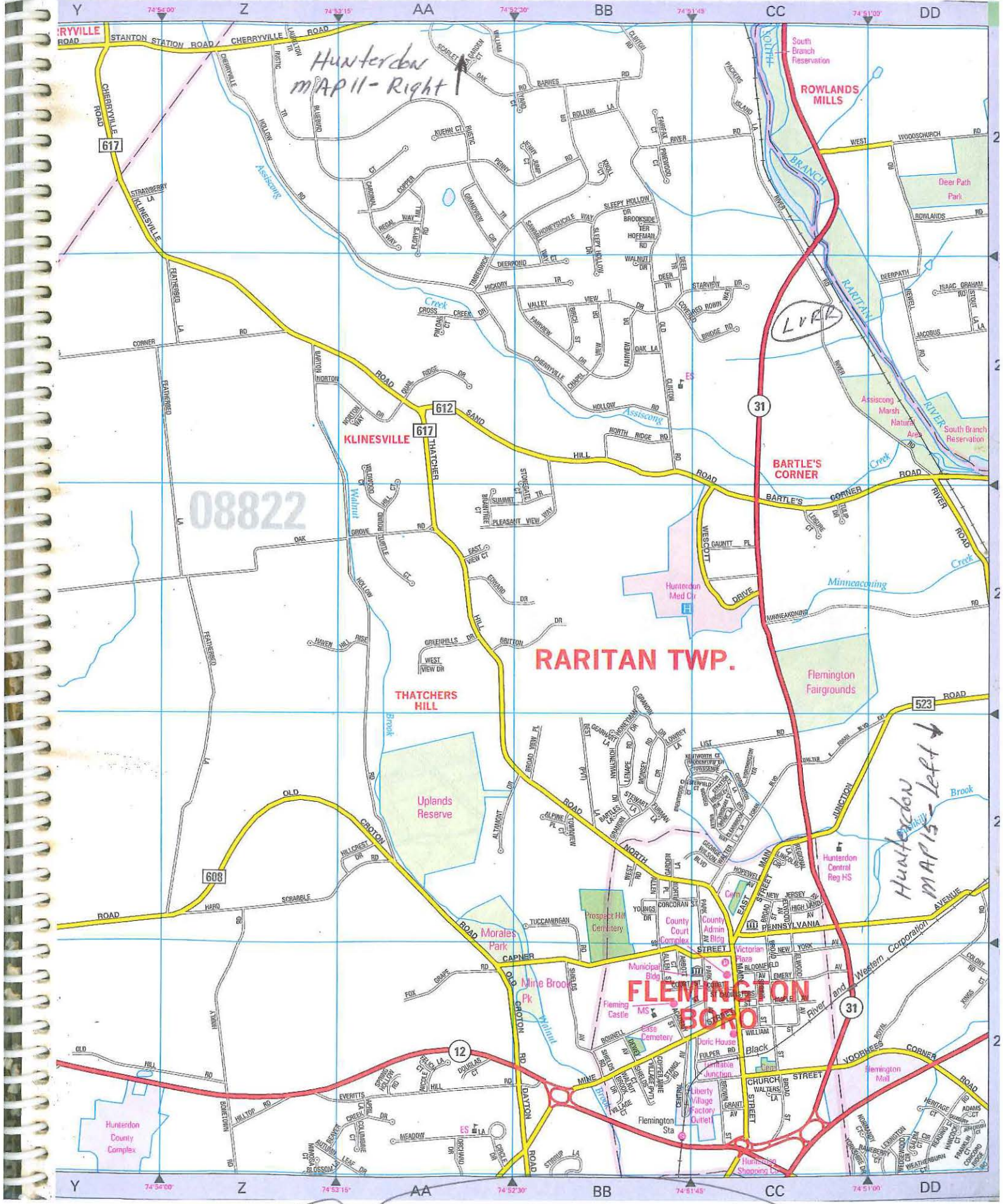
CHERRYVILLE

Hunterdon
MAP 11-Right

LVR

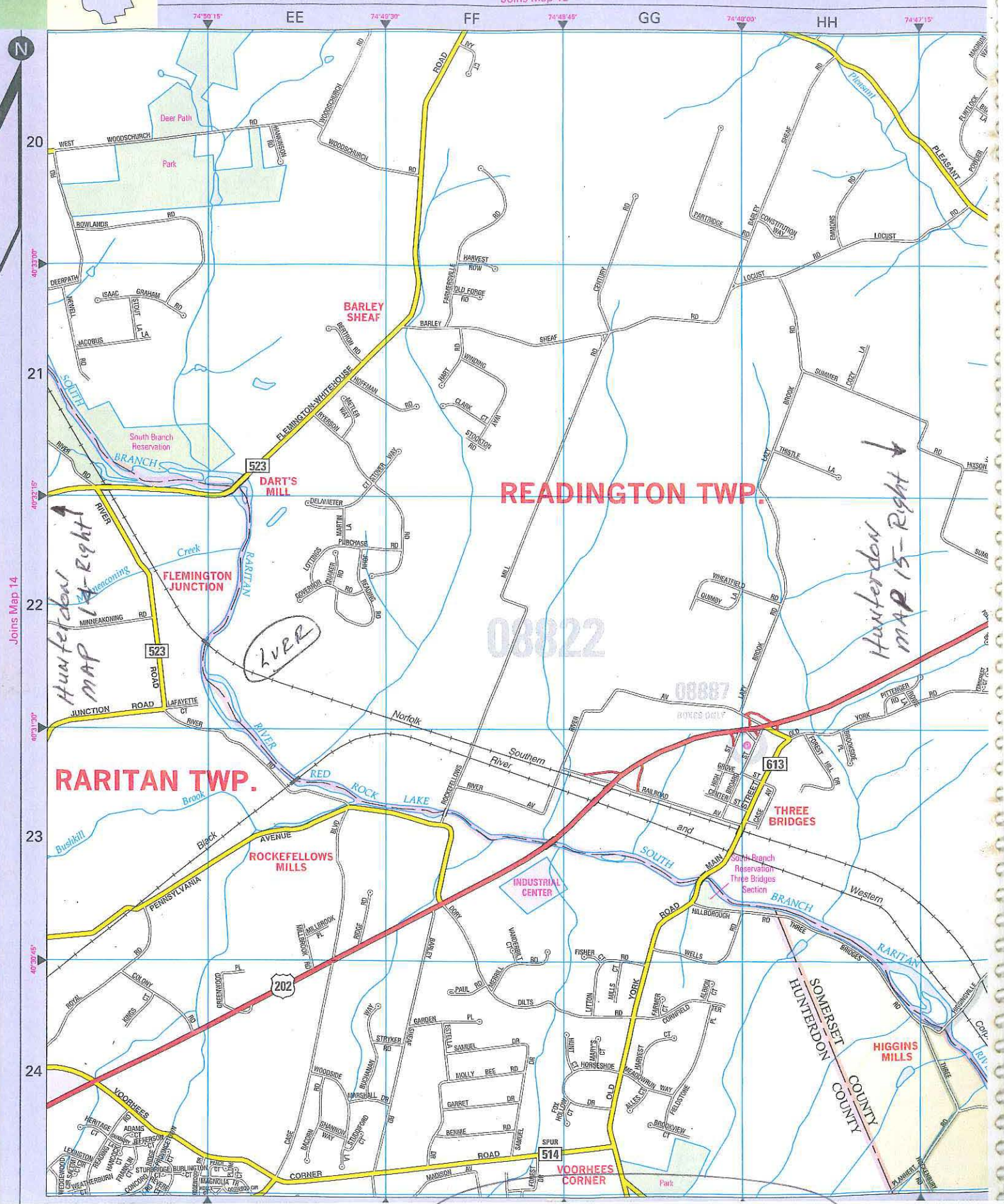
Hunterdon map 11-Left

22



LVRP

Hunterdon MAP 14-Right



LVR

Hunterdon MAP 15-Left

N

19

20

21

22

23

Joins Hunterdon County Map 15

08887

Hunterdon
MAP 15 - Right

THREE BRIDGES

HIGGINS MILLS

SOMERSET
HUNTERDON

CLOVER HILL

08822

Hillsborough
CC

BRANCHBURG
TOWNSHIP

WOODFERN

MONTGOMERY

Somerset-
MAP 11 -
Right

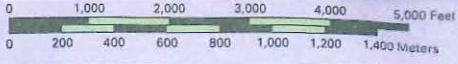
Somerset- MAP 11 - Left

LVRR

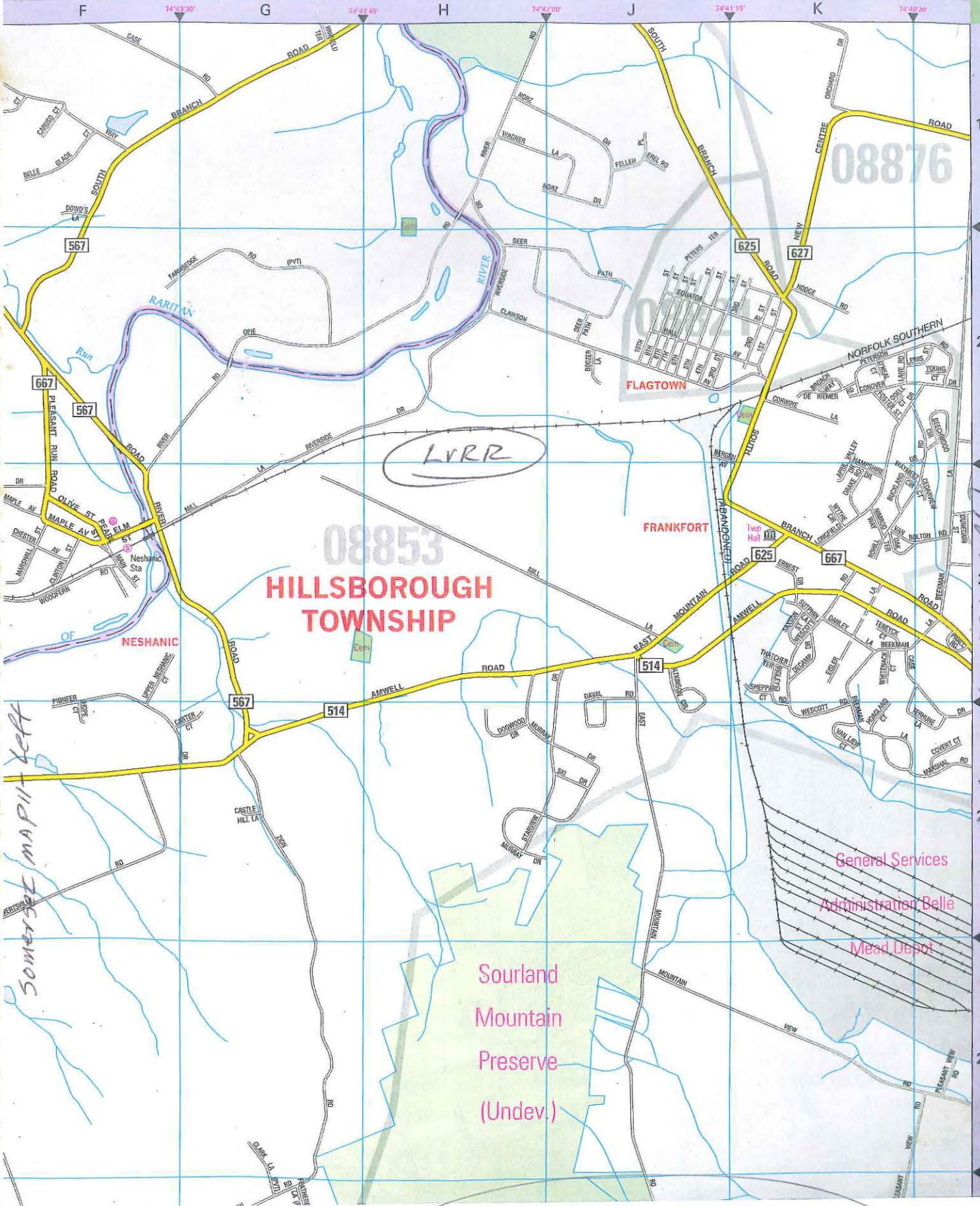
27

Each grid box represents approximately
0.65 mi. horizontally by 0.85 mi. vertically

Scale 1:24,000

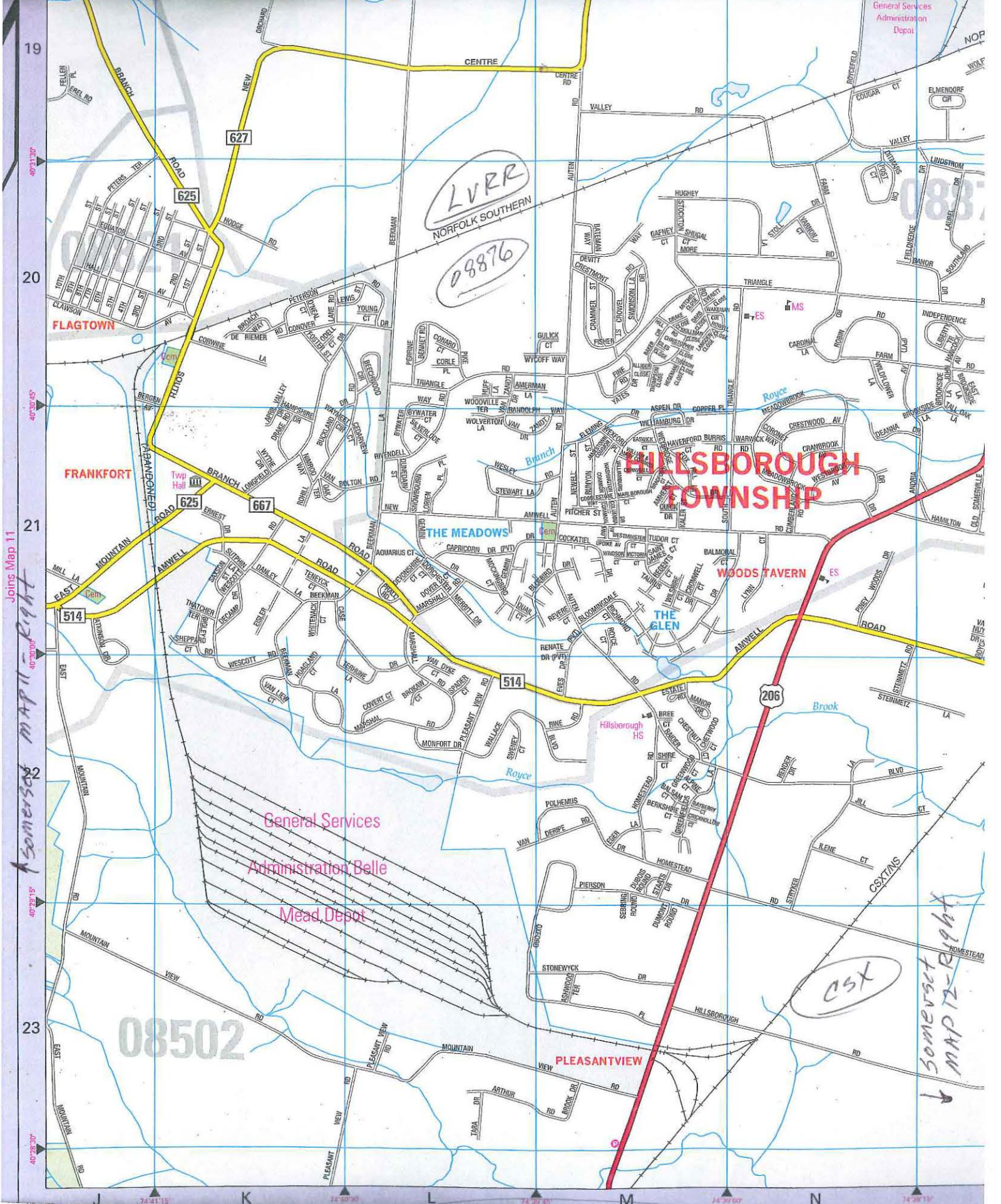


Joins Map 9



SOMERSET MAP 11 - Left

SOMERSET-MAP-11-Right
LvRR (28)



SOMERSET MAP 11 - Right

SOMERSET MAP 12 - Right

SOMERSET - MAP 12 - LEFT
LVRR 29

Each grid data represents approximately 0.65 mi. horizontally by 0.66 mi. vertically.

Somerset-Map 12-Right Scale 1:24,000

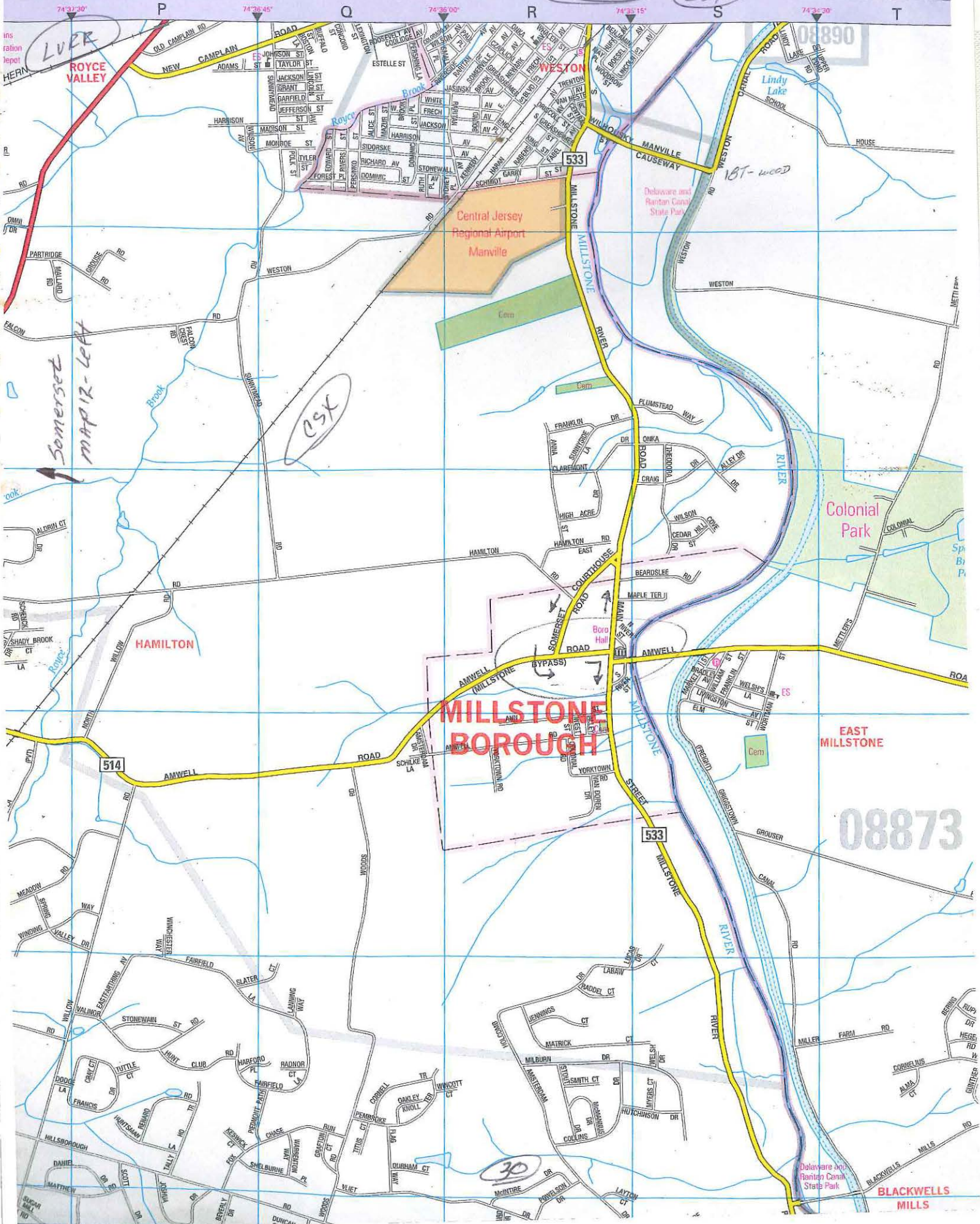


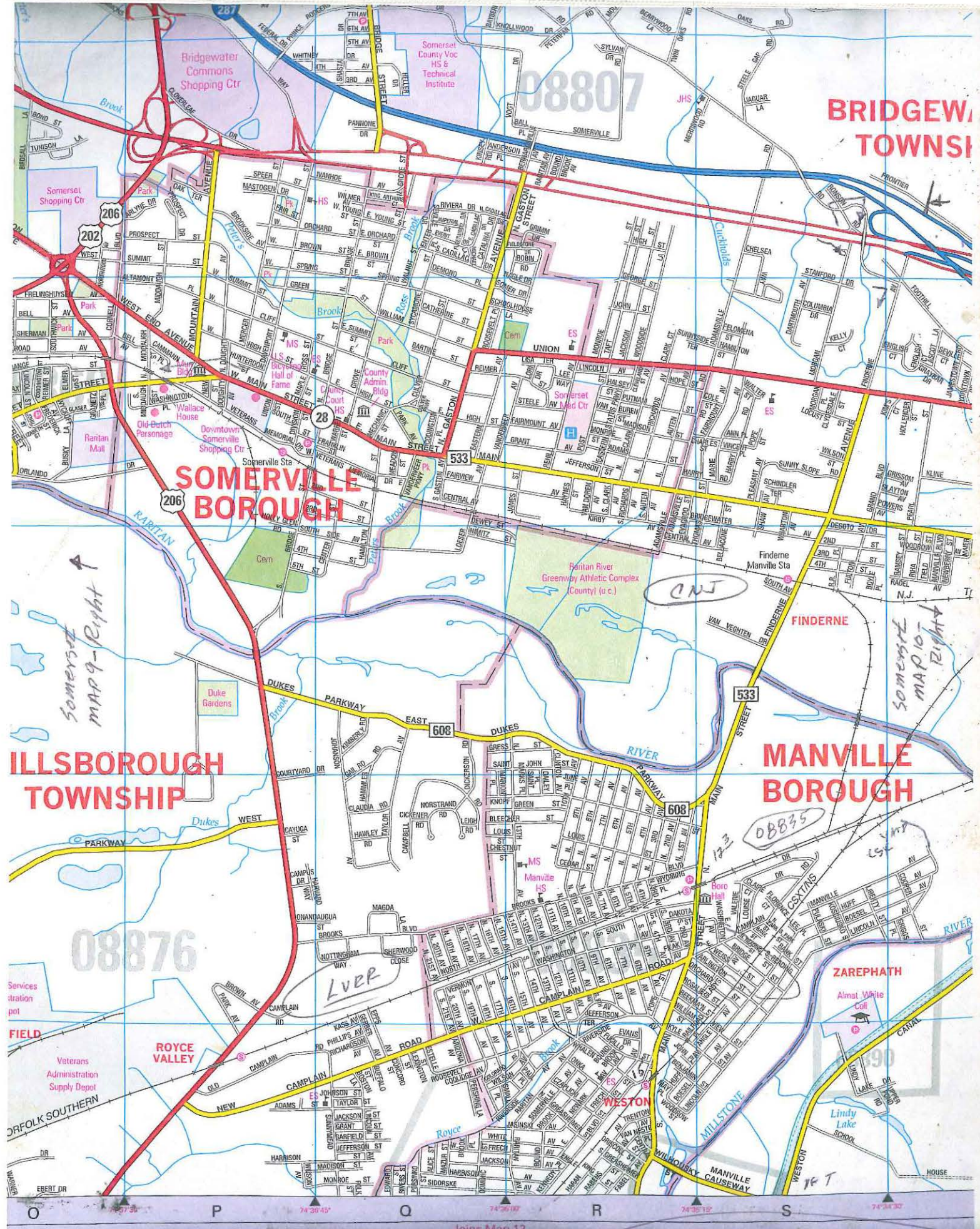
Somerset map 10-Left

Joins Map 10

LVRR

CSX





Map Company, Inc.

0 10 20 30 40 50 60 70 80 90 100

P Q R S

74°30'45" 74°30'15" 74°30'15" 74°34'30"

Joins Map 12

LVR - Manville - Somerset - MAP 10 - Left

31

SOMERSET
COUNTY

MIDDLESEX
COUNTY

UNION
COUNTY

CNJ: BOUND BROOK TO PISCATAWAY TO PLAINFIELD

 (SOMERSET) (MIDDLESEX) (SOMERSET)
 (MAP 10 - RIGHT) (MAP 1 - LEFT) (MAP 8 - RIGHT)

ZIP CODES: 08873 08805 08846 08812 07061 07062

LVRR: BOUND BROOK TO PISCATAWAY TO S. PLAINFIELD

 (SOMERSET) (MIDDLESEX) (MIDDLESEX)
 (MAP 10 - RIGHT) (MAP 1 - LEFT) (MAP 1 -RIGHT)

ZIP CODES: 08873 08805 08846 08854

Somerset map 10-Right



↑ somerset
map 10-left

33

middlesex-map-1-left

- LVRR
- CNT
- Port Reading Secondary

middlesex
map-1
Right

Somerset map 10 Right 4



late distance:
ents approximately
by 0.96 mi. vertically.

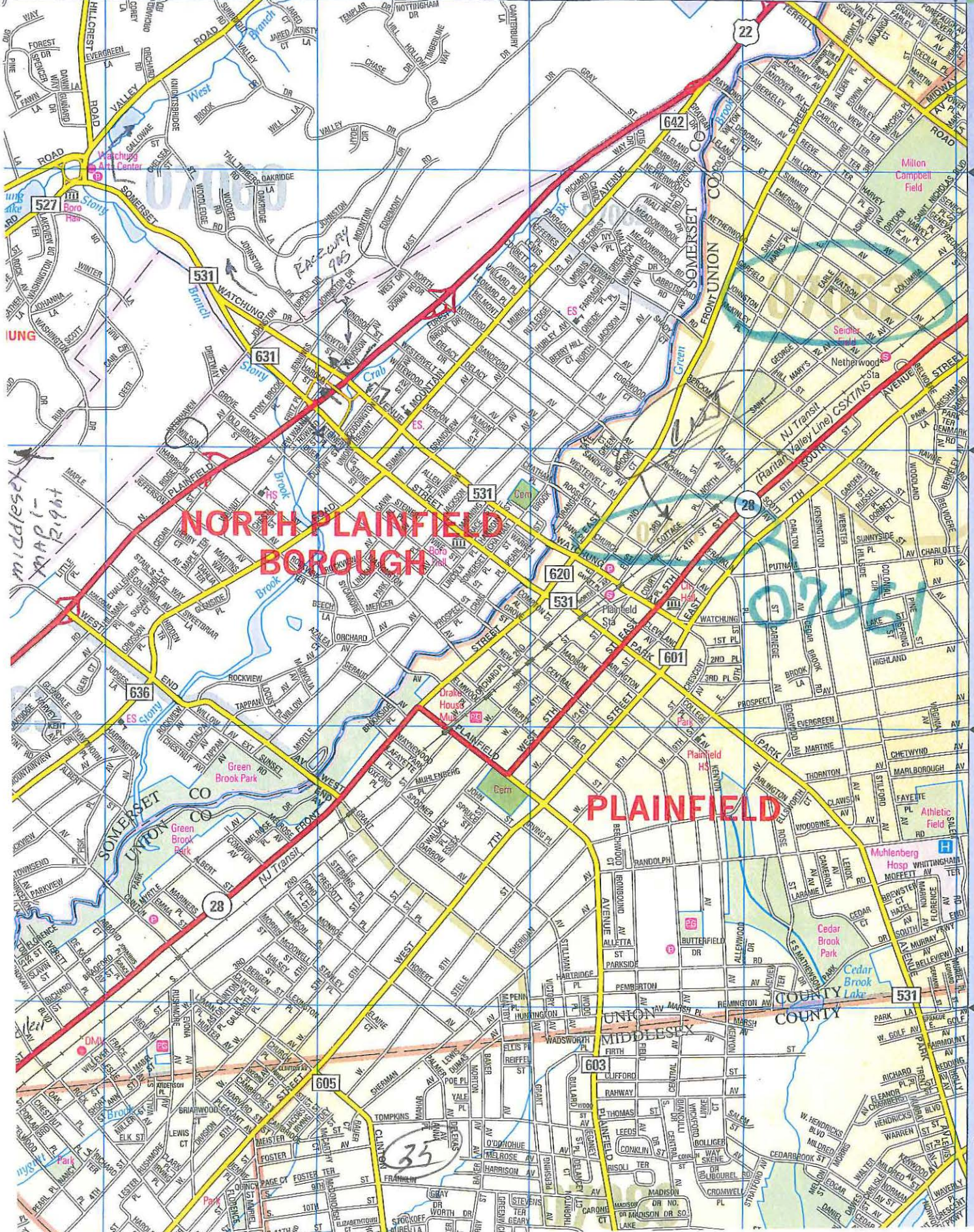
CNT

Dunellx
cc-14

Somerset- MAP8- Right
Scale 1:24,000
0 1,000 2,000 3,000 4,000 5,000 Feet
0 200 400 600 800 1,000 1,200 1,400 Meters

Ma
8

74°27'00" DD 74°26'15" EE 74°25'30" FF 74°24'45" GG 74°24'00"



10
11
12
13
14

For Adjoining Area See Hagstrom's Union/Hudson/Essex Counties Atlas

MIDDLESEX
COUNTY

MIDDLESEX
COUNTY

UNION
COUNTY

LVRR:	PISCATAWAY	TO	S. PLAINFIELD	TO	EDISON
	(MIDDLESEX)		(MIDDLESEX)		(MIDDLESEX)
	(MAP 1 - LEFT)		(MAP 1 -RIGHT)		(MAP 2 - LEFT)

ZIP CODES: 08854 07080 08820



UNION COUNTY

LVRR

Middlesex map 1-Right

Somerset map 8-Right

CNS

609

531

16N

29

Middlesex map 1-Left

Port Reading Secondary

SOUTH PLAINFIELD

Middlesex map 2-Left

For LVRR

07080

07080

37

07080

07080

07080

middlesex- map 2- left
LVRR

UNION
COUNTY

531



CONTINUED ON MAP 1

UNION COUNTY
MAPS

LVR: Map one: Passenger Terminal = Morris Canal
Freight main = Parallel to CNJ
Map Two: Bridge across Newark Bay to Oak Island
Map 3: OAK ISLAND

CNJ: **Map One:** Passenger Terminal = MP 0.0
Freight Yard = MP 1.7 (South Side Liberty State Park)

ZIP CODES: 07304 07305

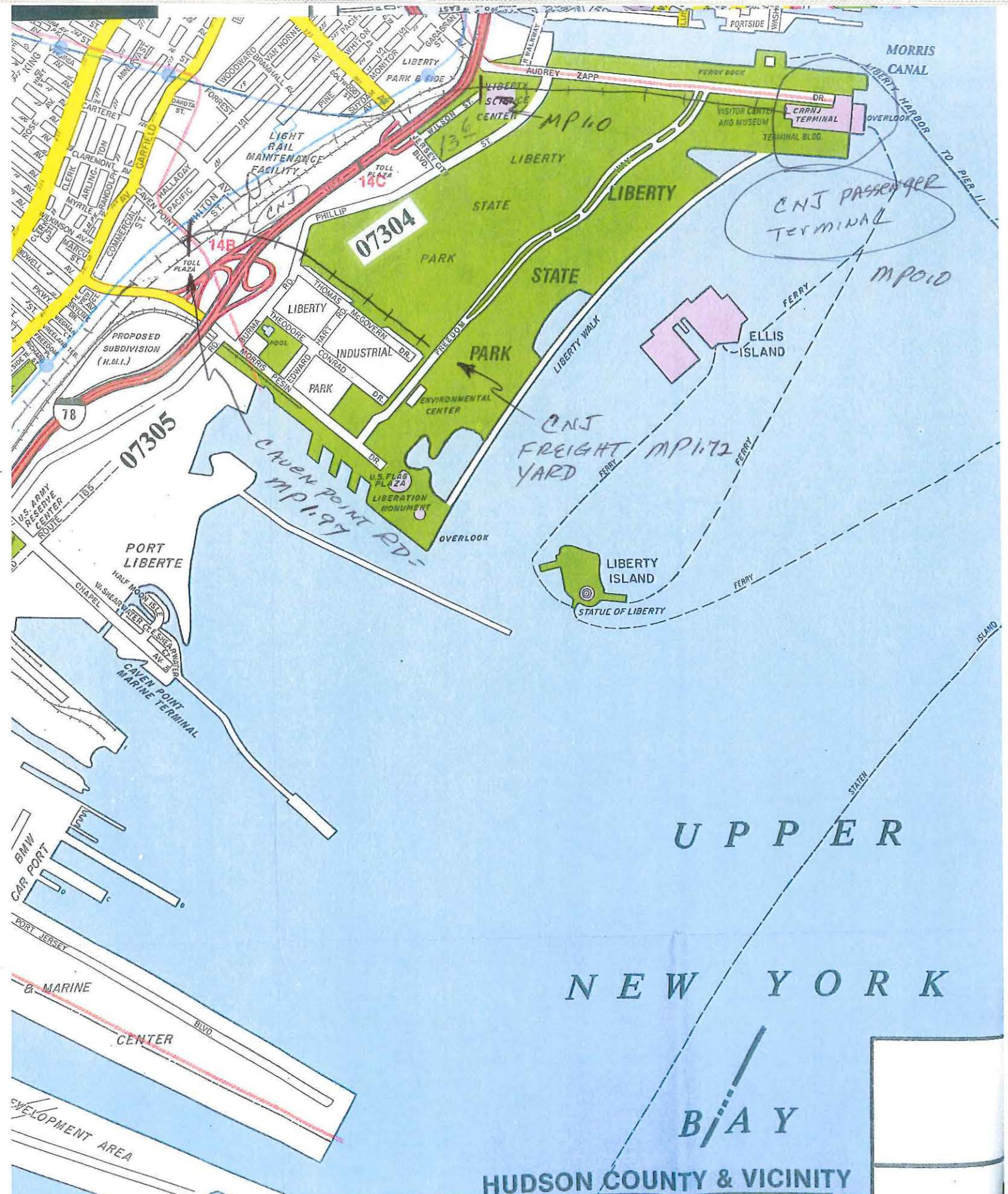
Map Two: Caven Point Road MP 1.97 to
E. 45th Street MP 4.41

ZIP CODES: 07304 07305 07302

Map Four: E. 45th Street MP 4.14 to
W. 8th Street MP 6.43

ZIP CODES: 07302

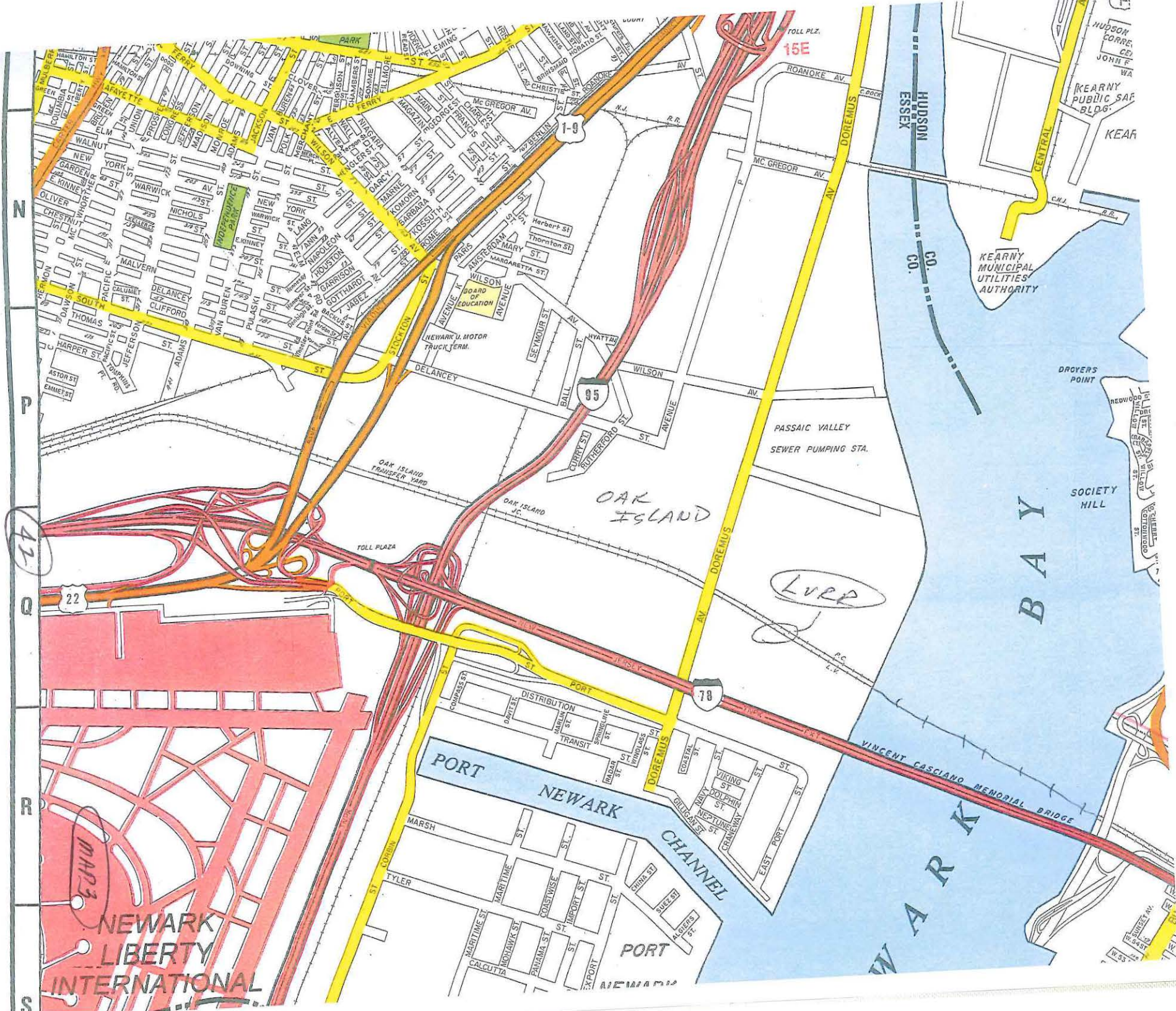
Map Five: E. 22nd Street MP 5.80 to
Union County / Hudson County Line MP 8.0 to
Elizabeth Port – Union County

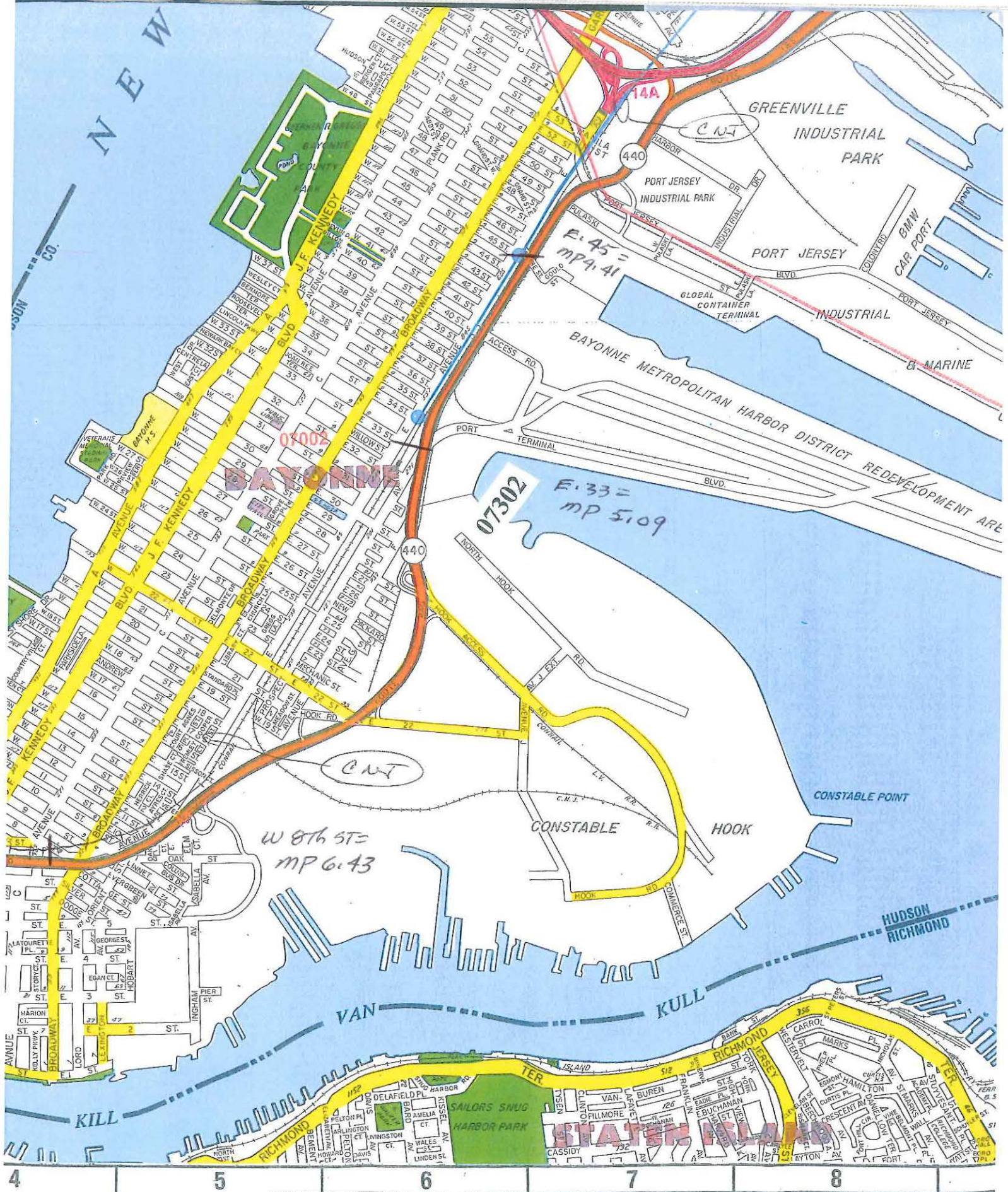


Hudson County
CNY (40)

MAP 1

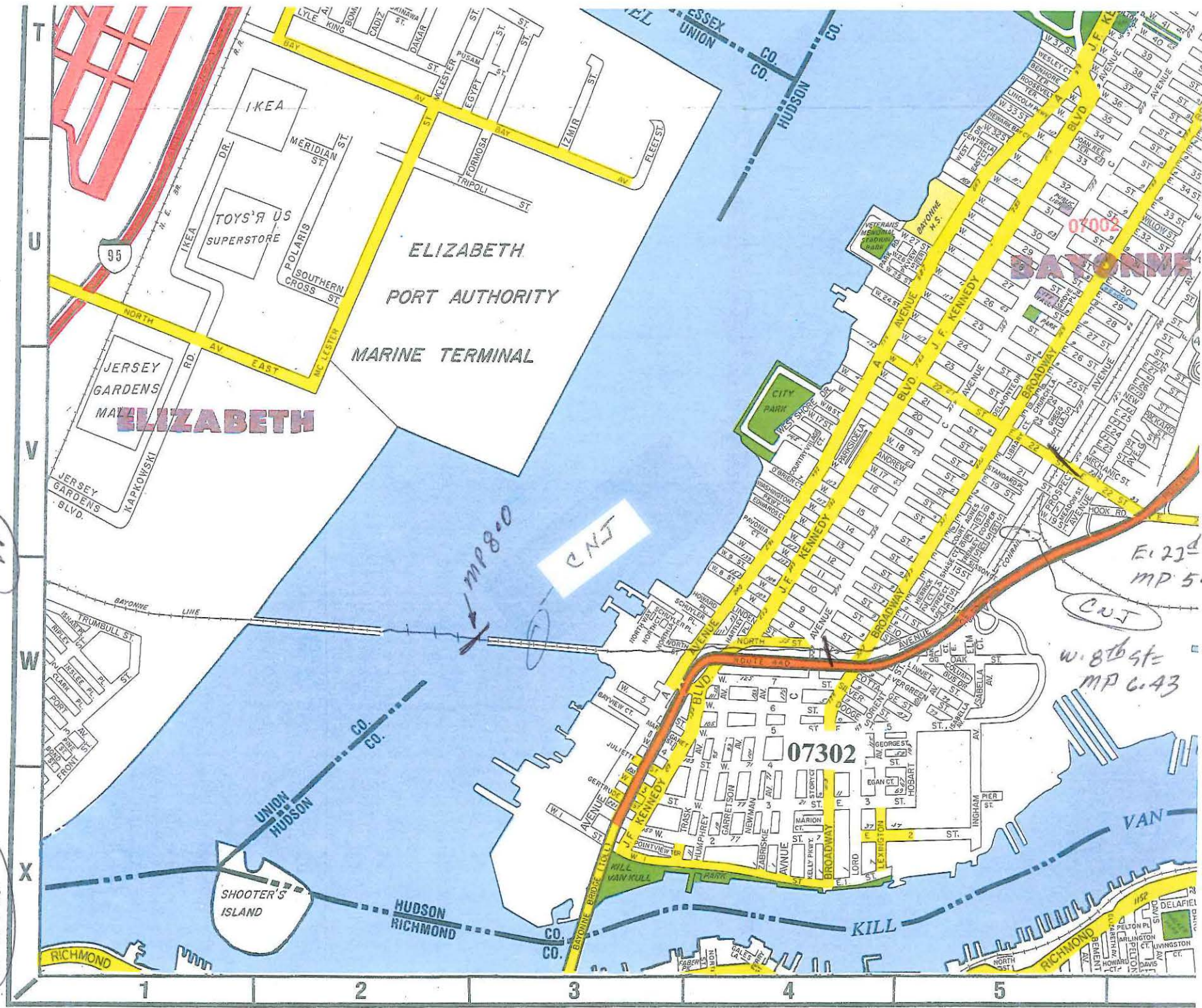






44

MAP 5



ELIZABETH

07002
BAYONNE

07302

CNY

E. 21st St =
MP 5.80

W. 8th St =
MP 6.43

1

2

3

4

5

Before the
Surface Transportation Board

JR - 6

STB DOCKET NO. AB-156 (Sub-No. 27X)

DELAWARE AND HUDSON RAILWAY COMPANY, INC. –
DISCONTINUANCE OF TRACKAGE RIGHTS EXEMPTION --
IN NY, PA, NJ, MD^{VA} AND DC

EXHIBIT TWO TO
MOTION / PETITION TO REJECT / REVOKE
D & H'S DISCONTINUANCE OF TRACKAGE RIGHTS EXEMPTION
MAPS SHOWING ZIP CODES TRACKAGE RIGHTS OF D & H
PASS THROUGH IN
HARFORD AND BALTIMORE COUNTIES, AND IN BALTIMORE CITY, MD

Filed by:

James Riffin
P. O. Box 4044
Timonium, MD 21094
(443) 414-6210

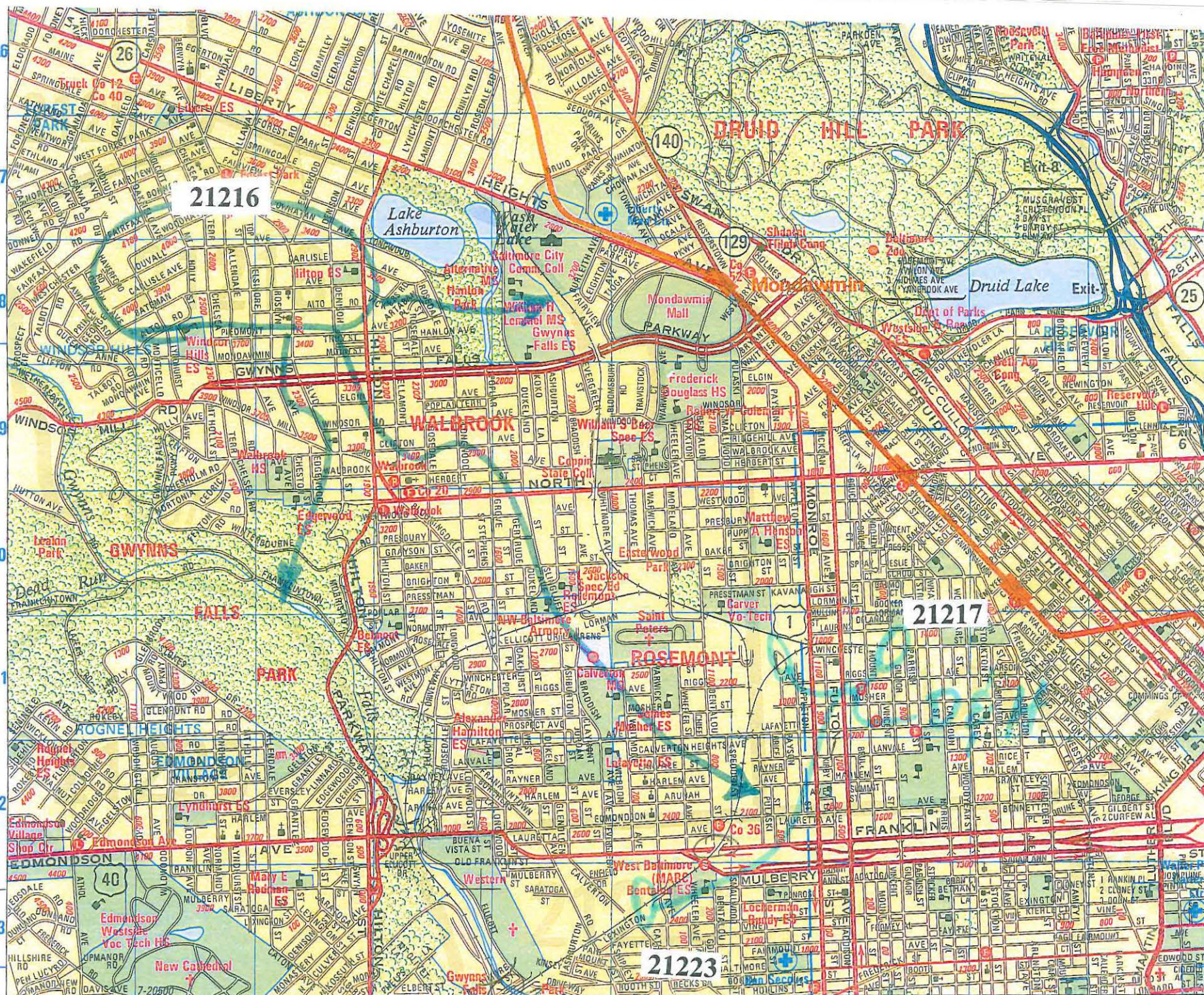
Baltimore City
Baltimore County map 34

Joins Map 33

540,000 FT

MD GRID 530,000 FT 39°17'30"

33



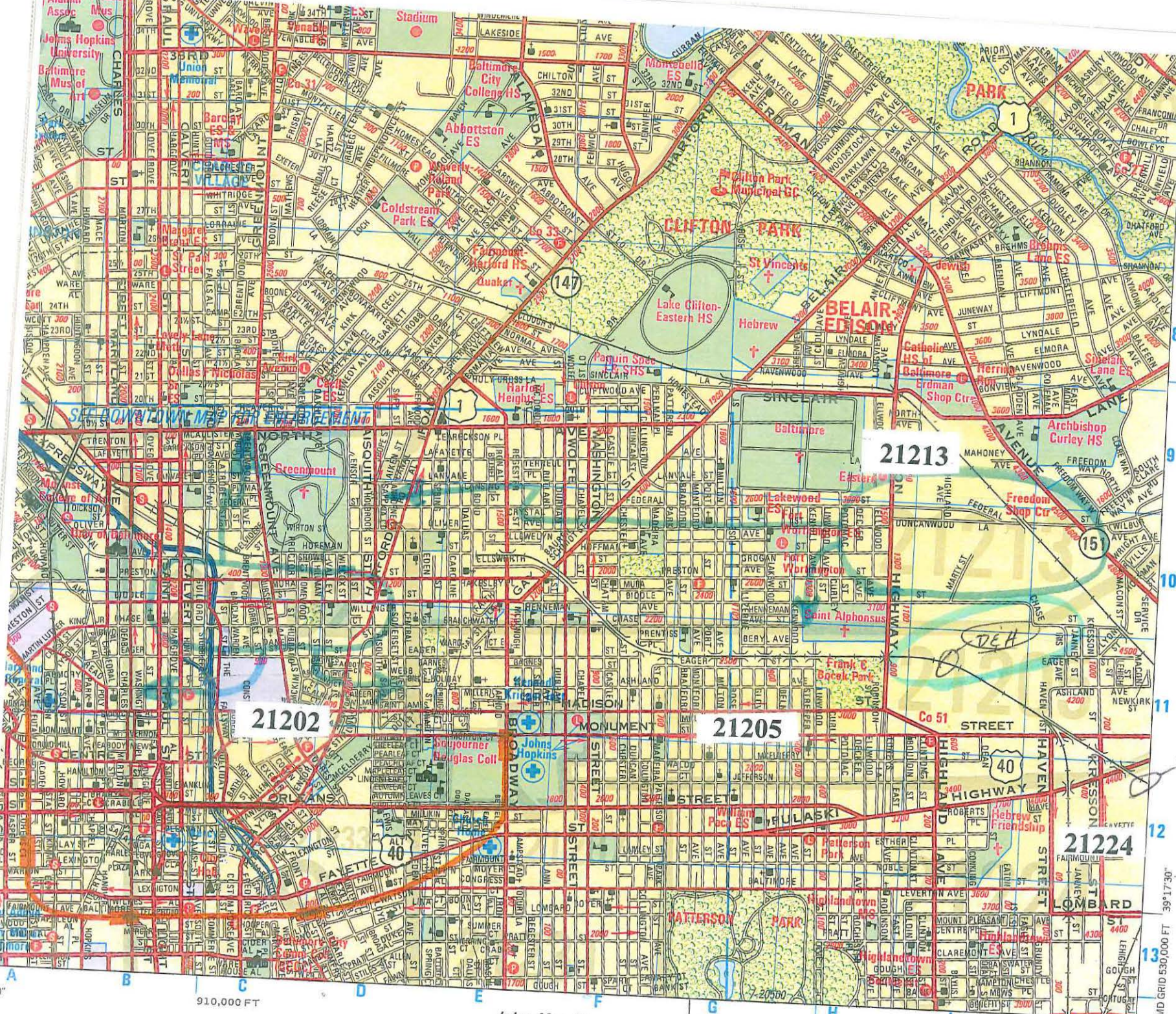
© ADC OF ALEXANDRIA, INC.

MD GRID 890,000 FT

76°40'00"

Joins Map 42

900,000 FT



Joins Map 36

Baltimore County MAP 35
BALTIMORE CITY

(2)

MD GRID 530,000 FT 39°17'30"

Joins Map 43

76°35'00"

MD GRID 920,000 FT

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Baltimore City
Baltimore County MAP 36





Before the
Surface Transportation Board

JR - 6

STB DOCKET NO. AB-156 (Sub-No. 27X)

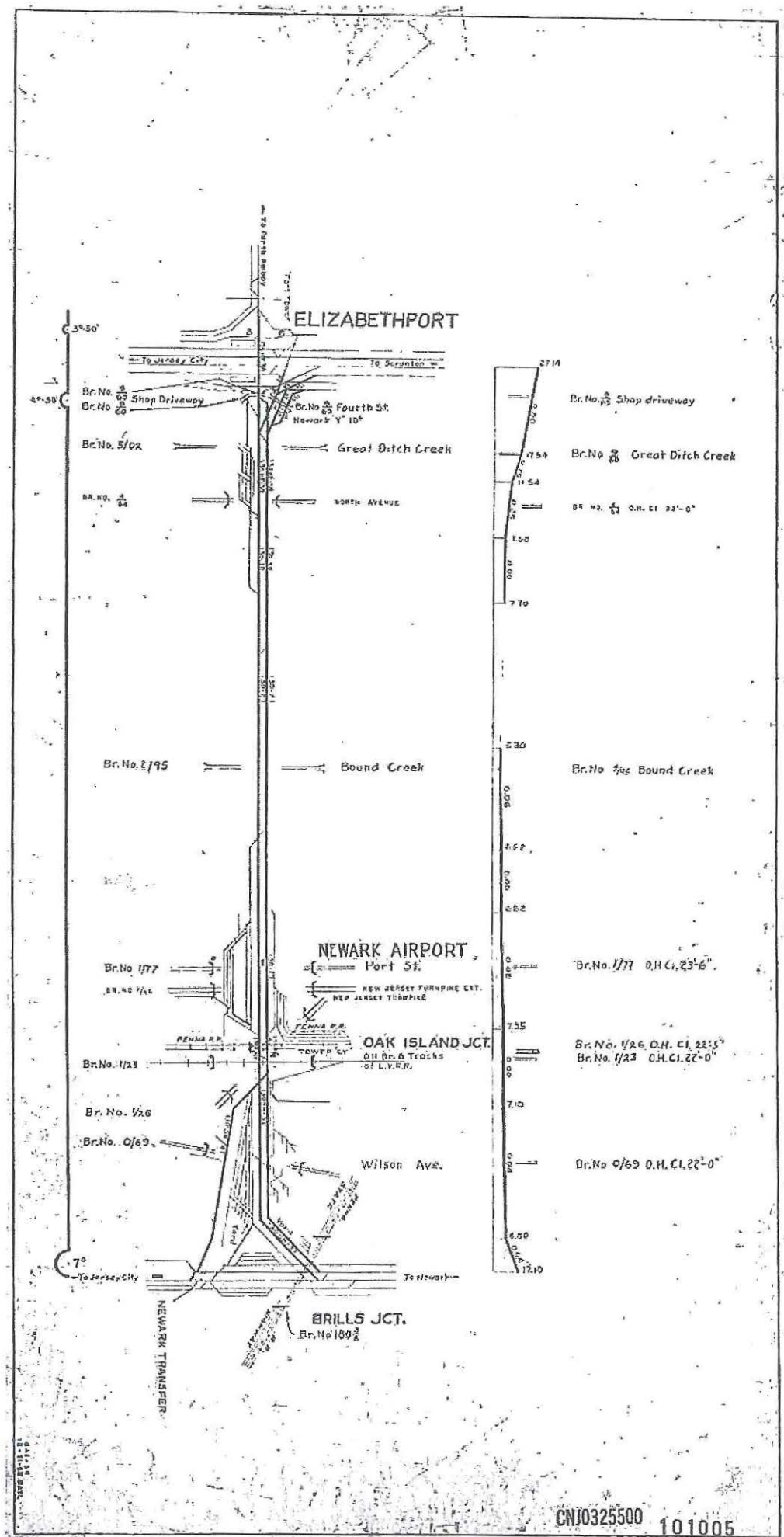
DELAWARE AND HUDSON RAILWAY COMPANY, INC. --
DISCONTINUANCE OF TRACKAGE RIGHTS EXEMPTION --
IN NY, PA, NJ, MD^{VA} AND DC
^{VA}

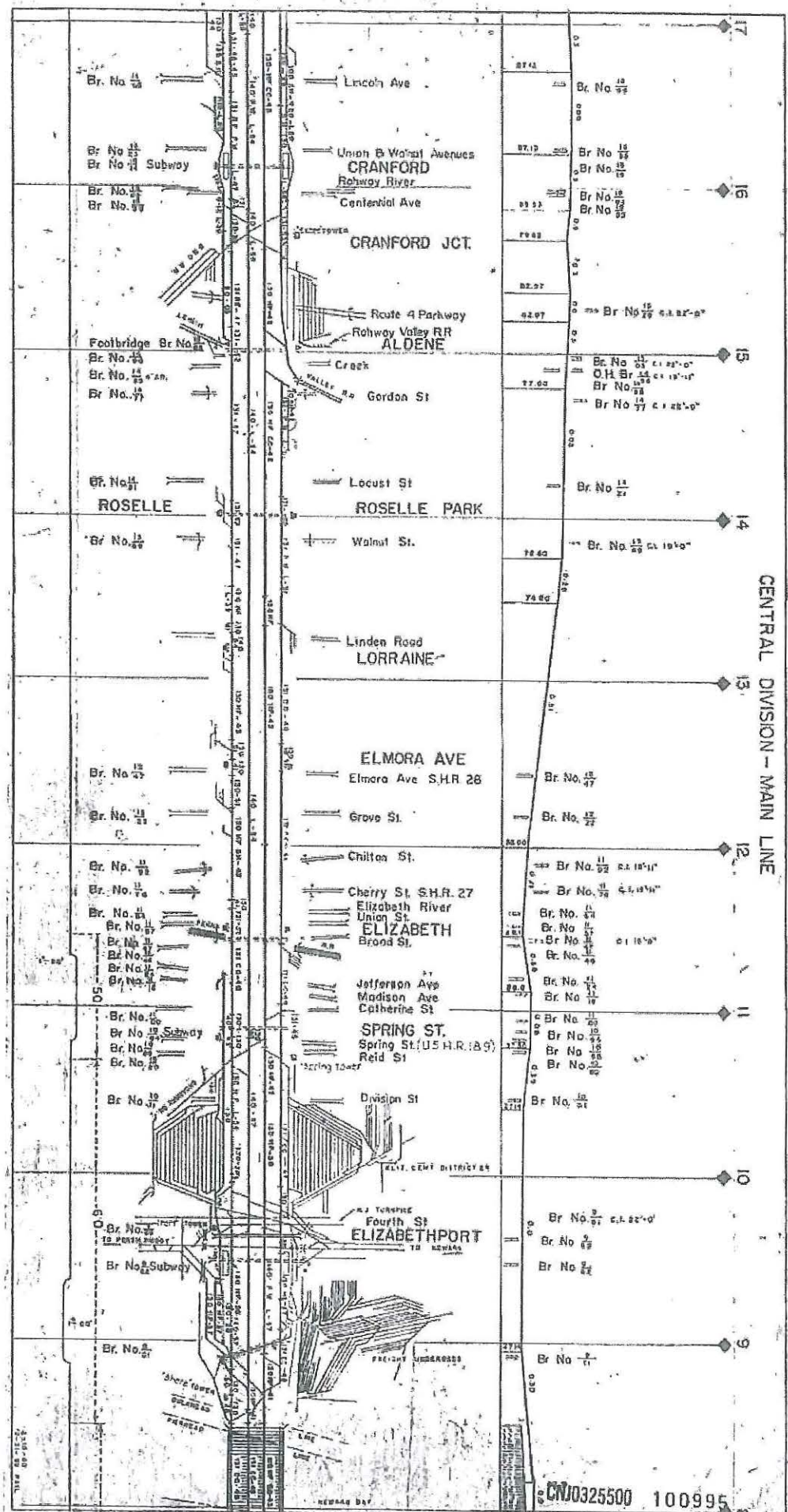
EXHIBIT THREE TO
MOTION / PETITION TO REJECT / REVOKE
D & H'S DISCONTINUANCE OF TRACKAGE RIGHTS EXEMPTION

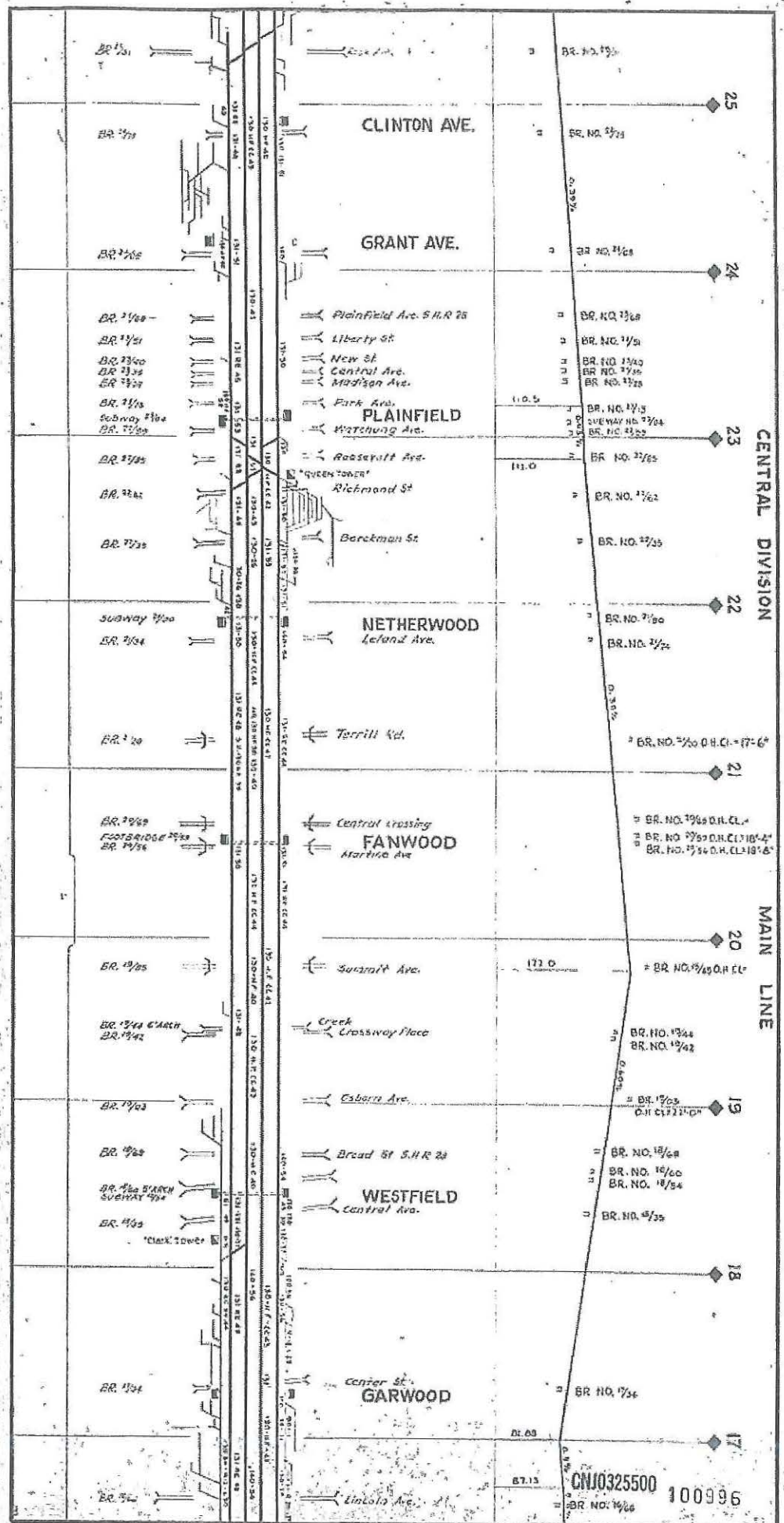
CNJ MAIN LINE TRACKAGE MAPS - NJ
MP 0.0 (Passenger Terminal) TO MP 76 (Glendon, PA)

Filed by:

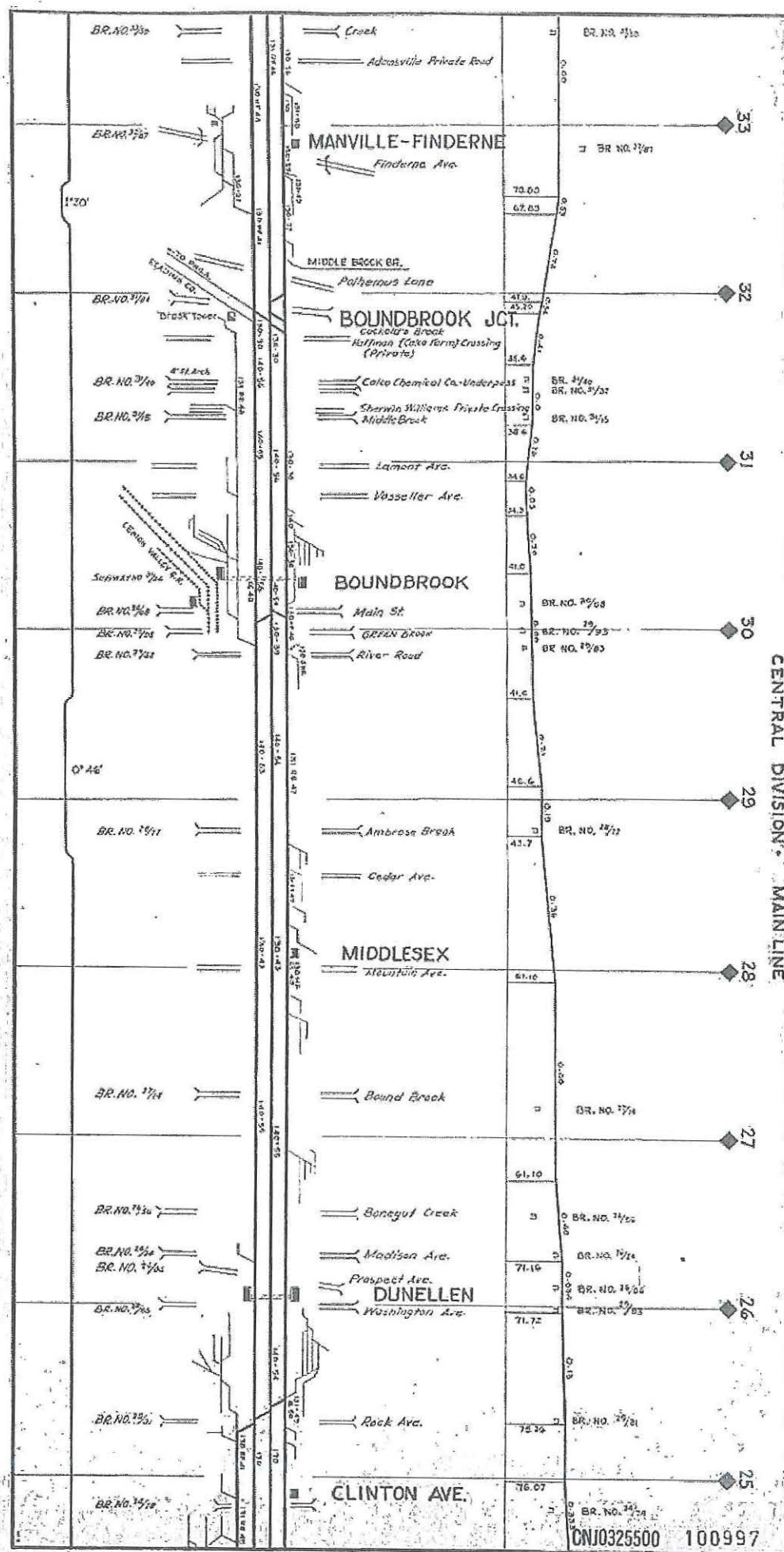
James Riffin
P. O. Box 4044
Timonium, MD 21094
(443) 414-6210



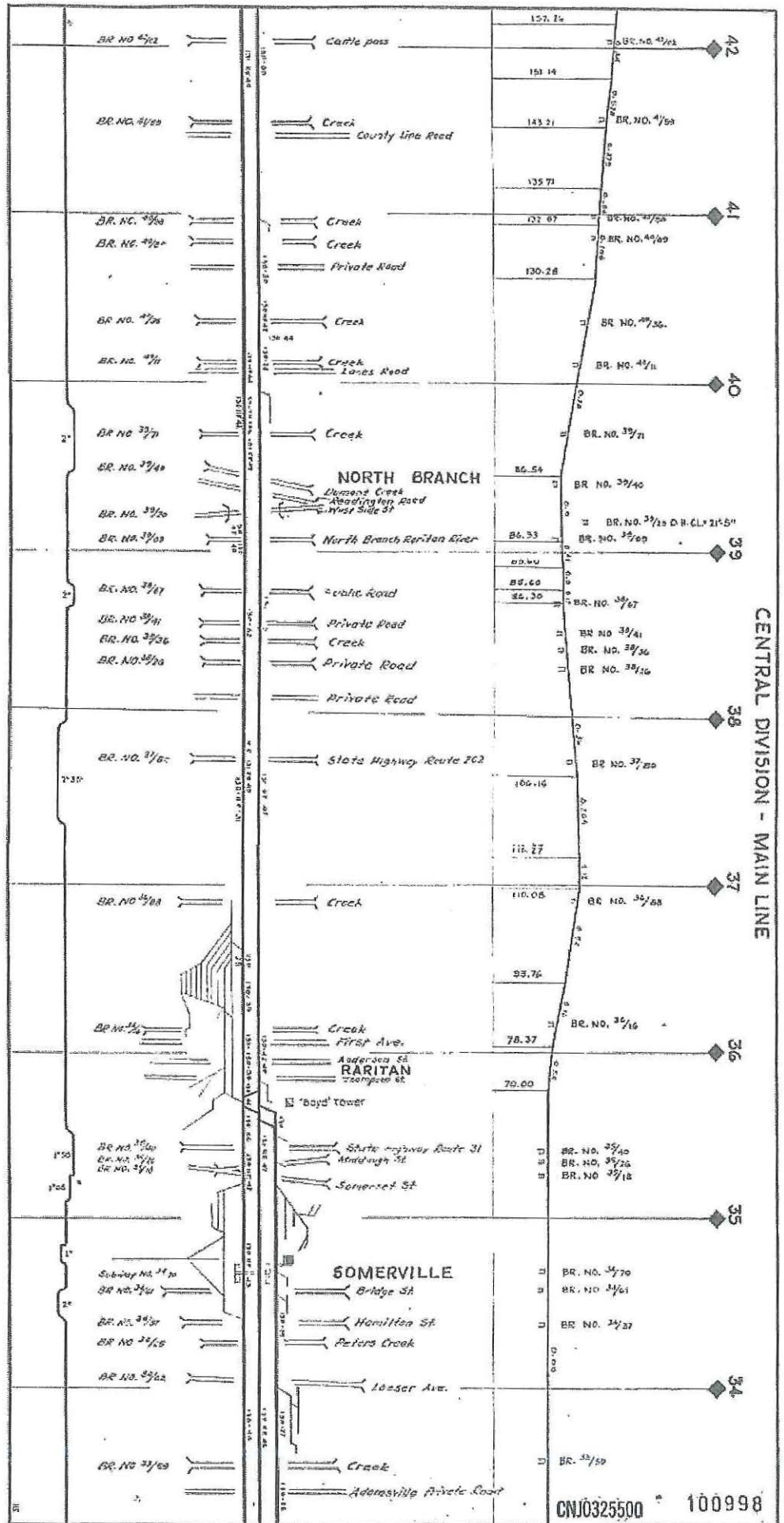


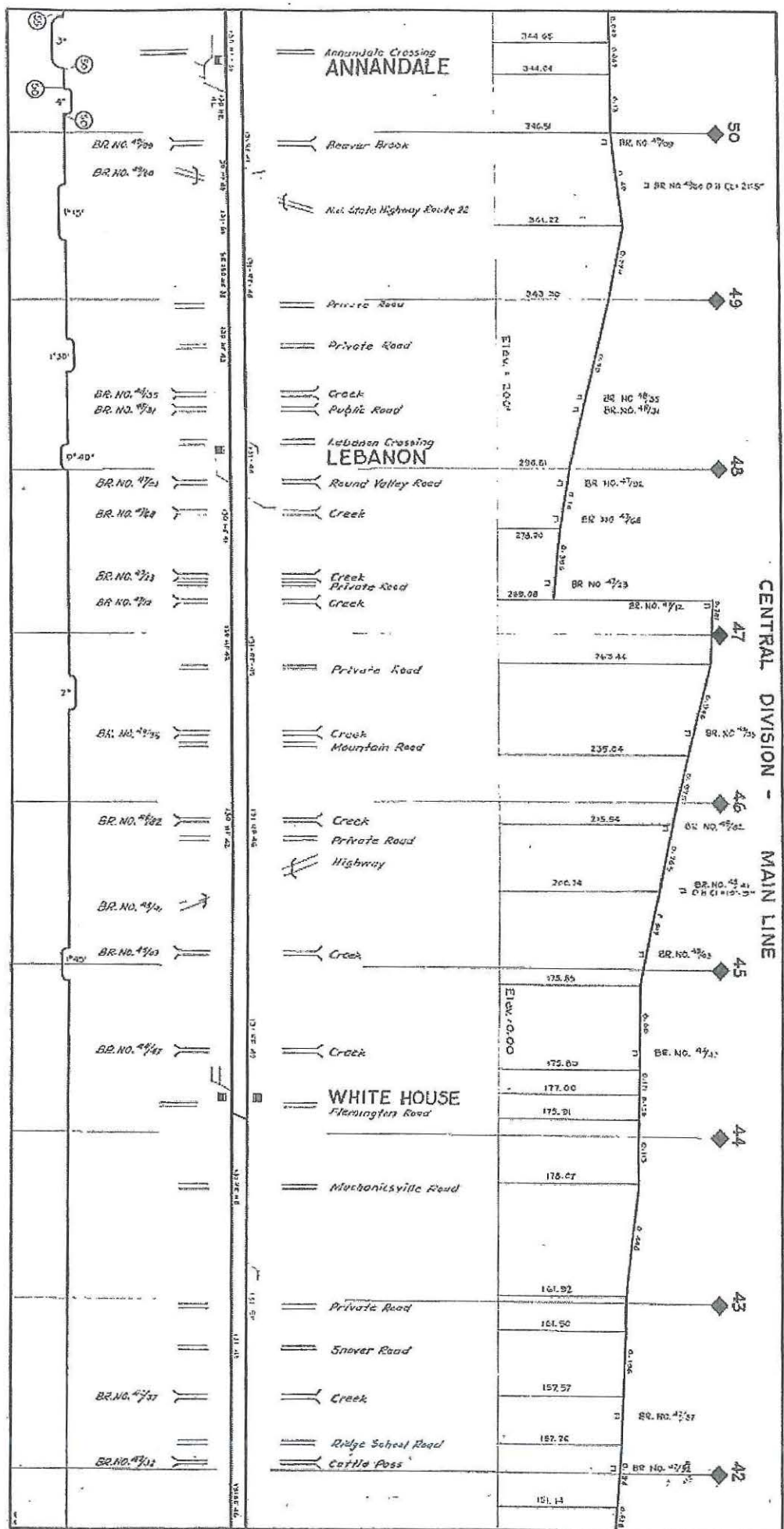


CNJ0325500 100996



CENTRAL DIVISION - MAIN LINE





CNJ0325500

