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Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423-0001

**Re: Finance Docket No. 32760 (Sub-No. 46), BNSF  
Railway Company — Terminal Trackage Rights —  
The Kansas City Southern Railway Company and  
Union Pacific Railroad Company**

Dear Ms. Brown:

Enclosed for electronic filing in the above-captioned proceeding are Public and Highly Confidential versions Union Pacific Railroad Company's Reply to BNSF's Petition to Establish Conditions of Use and Compensation. We are also submitting via hand delivery a disc containing Counsel's Exhibit 11. The exhibit is part of the public submission.

Please contact me if you have any questions. Thank you.

Sincerely,

Michael L. Rosenthal  
*Counsel for Union Pacific  
Railroad Company*

Enclosure

cc: Peter W. Denton  
Edward D. Greenberg  
William A. Mullins,  
Adrian L. Steel, Jr.  
All parties of record

BEFORE THE  
SURFACE TRANSPORTATION BOARD

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Finance Docket No. 32760 (Sub-No. 46)

BNSF RAILWAY COMPANY  
— TERMINAL TRACKAGE RIGHTS —  
KANSAS CITY SOUTHERN RAILWAY COMPANY AND  
UNION PACIFIC RAILROAD COMPANY

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**UNION PACIFIC RAILROAD COMPANY’S REPLY TO BNSF’S PETITION  
TO ESTABLISH CONDITIONS OF USE AND COMPENSATION**

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June 25, 2018

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BEFORE THE  
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**UNION PACIFIC RAILROAD COMPANY’S REPLY TO BNSF’S PETITION  
TO ESTABLISH CONDITIONS OF USE AND COMPENSATION**

**I. INTRODUCTION**

BNSF’s Petition does not present a viable operating plan for BNSF direct service to LYB. BNSF’s proposed plan and illustrative animation are fantasies. They do not reflect actual conditions in the Lake Charles area, particularly in Rose Bluff Yard, on the Rose Bluff Industrial Lead, and on the Montell Lead. Union Pacific and KCS have developed carefully coordinated arrangements for serving shippers using these capacity-constrained facilities. These facilities cannot accommodate direct service by a third railroad. A Board order forcing three railroads into existing facilities will severely impair customer service in the Lake Charles area and beyond. BNSF’s *own* studies show its plan would create multiple conflicts with existing operations. Altering operations to avoid any one conflict would produce new cascades of delay and disruption. Shippers in the Lake Charles area would bear the brunt of the harm, but the impacts would ripple across our network.

Union Pacific’s concern here is harm to customers and the rail network, not the potential loss of LYB business to BNSF. Union Pacific is not protecting a commercial advantage. BNSF

already handles {{ }}<sup>1</sup> Whatever incremental benefit BNSF might gain from directly serving LYB would be outweighed by the harmful externalities inflicted on shippers other than LYB.

BNSF's plan to serve LYB cannot be accommodated without adding capacity to address constraints in Rose Bluff Yard, on the Rose Bluff Industrial Lead, and on the Montell Lead. Coordination among Union Pacific, KCS, and BNSF will be necessary, but it will not be sufficient. However, BNSF refuses to acknowledge the need for more capacity. This stands to reason. BNSF has no incentive to add capacity to support direct service. It is already an effective competitor using its existing rights. As stated above, it already handles {{ }} Indeed, it handles {{

}} And Union Pacific cannot justify investing in capacity BNSF would use to serve LYB and other shippers in the Lake Charles area.

The Board has acknowledged this case is "unique." Decision No. 3 at 18. Union Pacific is therefore proposing a unique solution: the Board should condition BNSF's use of the Rose Bluff Industrial Lead on BNSF's agreement to swap responsibility with Union Pacific for Rose Bluff Yard, the Rose Bluff Industrial Lead, and the Montell Lead. BNSF would simply step into Union Pacific's shoes, handling traffic directly where Union Pacific directly serves shippers today, interchanging traffic with KCS just as Union Pacific interchanges traffic with KCS today, and providing reciprocal switching to Union Pacific under the same terms that apply when Union Pacific provides reciprocal switching to BNSF today. Union Pacific is proposing this sweeping

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<sup>1</sup> Material within double brackets is Highly Confidential, and material within single brackets is Confidential. This material has been redacted from the Public version of this reply.

solution because the alternative would be a disaster. We are not willing to sacrifice service to customers and network operations to prove a point.

For purposes of this reply, Union Pacific is not challenging the Board's conclusions in Decision No. 3. Nor are we challenging the Board's decision to proceed before BNSF has sought or obtained terminal trackage rights to operate the track connecting the Rose Bluff Industrial Lead to the Montell Lead (Track 800). We are also not challenging the Board's decision to proceed before BNSF has obtained access to the Montell Lead. We are simply addressing the conditions the Board should impose on BNSF direct service to LYB, if Decision No. 3 withstands judicial review and if BNSF obtains lawful access to Track 800 and the Montell Lead.

The remainder of this reply is organized as follows. *Part II* describes railroad operations in the Lake Charles area and communications among Union Pacific, BNSF, and KCS regarding BNSF direct service to LYB. *Part III* demonstrates BNSF's proposed operating plan is not viable without additional capacity, and describes the consequences of authorizing direct service to LYB. *Part IV* describes Union Pacific's proposed condition for BNSF's use of terminal trackage rights on the Rose Bluff Industrial Lead to serve LYB. *Part V* explains BNSF must pay any incremental costs of its decision to operate using trackage rights, including any appropriate compensation to KCS for BNSF's presence on the Rose Bluff Industrial Lead. The factual information Union Pacific presents in this reply has been verified by employees with responsibilities for the matters identified in their verifications.

## **II. BACKGROUND**

### **A. Railroad operations in the Lake Charles area and service to LYB**

The Lake Charles area is part of a very busy rail corridor that requires careful coordination and close cooperation among Amtrak and freight railroads with various rights to operate and serve local customers in Lake Charles, Westlake, and West Lake Charles. See Counsel's Exhibit 1.

Coordination and cooperation are especially required to serve the 24 active customer facilities in Westlake and West Lake Charles whose traffic is switched by Union Pacific and KCS in Rose Bluff Yard. *See Counsel's Exhibit 2.*

### **1. Operations on the Lafayette Subdivision (the 50/50 Line)**

The Lake Charles area is located along Union Pacific's Lafayette Subdivision (often called the 50/50 Line, because it is jointly owned by Union Pacific and BNSF). Union Pacific and BNSF operate an average of 20 trains each day over the 50/50 Line in the Lake Charles area. KCS crosses the main line to enter Rose Bluff Yard and serve customers on the Rose Bluff Industrial Lead. Amtrak's Sunset Limited travels over the main line six days a week, three times westbound, and three times eastbound.

Capacity on the 50/50 Line is severely limited, especially in the Lake Charles area. The 50/50 Line is almost entirely single track. There are no sidings between Union Pacific's Lake Charles Yard, also known as North Yard (on the east end of the Lake Charles area) and the turnout to the Rose Bluff Industrial Lead (on the west end). To the east of the Lead, the nearest siding is the Iowa Siding, 14 miles away. Iowa is the only siding between the Lead and BNSF's Lacassine Yard, which is 18 miles east of the Lead.

Capacity on the 50/50 Line is further limited by a single-track swing bridge over the Calcasieu River, located between North Yard and the turnout to the Lead. Maritime traffic receives priority over railroad traffic. Unscheduled bridge openings occur on average four times a day, and each opening lasts at least 15 to 20 minutes. The disruption to rail activity lasts longer, because trains must stop well short of the bridge before it opens and accelerate back to track speed after it closes. Trains stopped for the bridge cause delays further down the line because other approaching trains will not have a clear signal to proceed until the bridge closes and waiting trains resume their operations.

## **2. Operations in North Yard**

Union Pacific's primary yard in the Lake Charles area is North Yard, which is a local support yard. It receives cars destined for local customers, and it builds blocks of cars for delivery to those customers and for delivery to smaller serving yards, primarily Rose Bluff Yard. It also supports interchange between Union Pacific and BNSF. When BNSF has cars for LYB and other customers in Lake Charles, Westlake, or West Lake Charles, it hands them to Union Pacific at North Yard. When customers Union Pacific switches in those areas have cars for BNSF, Union Pacific hands them to BNSF at North Yard.

## **3. Operations in Rose Bluff Yard**

Rose Bluff Yard is the primary serving yard Union Pacific uses for customers in Westlake and West Lake Charles. The Yard is located on the Rose Bluff Industrial Lead about a half-mile south of the 50/50 Line. As shown in Counsel's Exhibit 3, the Yard consists of six tracks: a center runner track, and five other tracks that tie into the runner track at each end of the yard. Tracks 1, 2, 3, 5, and 6 can each hold between 80 and 85 cars without obstructing a switch to an adjacent track. Track 3 extends one and a half miles south of the Yard, and the extension is used for overflow storage. Track 4, the runner track, is the only track that runs through the entire Yard. Because all six tracks converge at each end of the Yard or on the Lead, Track 4 is effectively the only track that can be used to access the 50/50 Line and the Lead. Yet Track 4 is frequently blocked during switching operations and when trains entering the Yard cannot fit all their cars on another track. Most Union Pacific trains that enter the Yard are long enough that they must leave some cars on Track 4 while they are working in the Yard.

Union Pacific and KCS jointly own Rose Bluff Yard and the Rose Bluff Industrial Lead under the terms of a 1948 joint facility agreement between KCS and Union Pacific predecessor T&NO. Due to the significant physical and operational constraints in the area, the joint owners

long ago recognized the need to operate the Yard and local trackage in a coordinated manner to serve customers in Westlake and West Lake Charles. In 1981, KCS and Southern Pacific (Union Pacific's predecessor) divided the area into customer zones, "Zone 1" and "Zone 2." As shown in Counsel's Exhibit 2, Zone 1 customers are generally located north and east of Rose Bluff Yard, and Zone 2 customers, including LYB, are located south of the Yard. The railroads agreed to use the Yard only for handling cars destined to or originating from Zone 1 or Zone 2, and that, with limited exceptions, the exchange between the carriers of cars destined to or from either Zone 1 or Zone 2 would be made in the Yard.

The railroads initially traded responsibilities for the two zones every two years. In 1999, KCS and Union Pacific eliminated this arrangement, agreeing that KCS would be responsible for switching only customers in Zone 1 and Union Pacific would be responsible for switching only customers in Zone 2.

Union Pacific, KCS, and BNSF line-haul traffic moving to customers in both zones passes through Rose Bluff Yard, where it is switched by either Union Pacific or KCS for delivery by a local job. Outbound traffic picked up from customers in both zones also passes through Rose Bluff Yard, where Union Pacific or KCS switches it for movement beyond.

To support switching for customers of all three railroads, Union Pacific and KCS share Rose Bluff Yard in separate 12-hour operating windows. Union Pacific's window in the Yard is from 6:00 am to 6:00 pm, and KCS's window is from 6:00 pm to 6:00 am. KCS has primary use of Tracks 1-3, and Union Pacific has primary use of Tracks 5 and 6. This means before Union Pacific turns over the Yard to KCS, we leave the cars KCS will handle on Tracks 1-3, and cars Union Pacific will handle on Tracks 5 and 6. During Union Pacific's window, however, our crews operate over all six tracks in the Yard, including the runner track, to break down trains and build

trains for switching into Zone 2 or forwarding to North Yard, or to interchange cars with KCS. Union Pacific trains enter the Yard over the runner track (Track 4) and then use that track and Tracks 1, 2, 3, 5, and 6 to sort cars and build blocks to be moved by Union Pacific or KCS.

For example, some Union Pacific trains bring cars up the Rose Bluff Industrial Lead into Rose Bluff Yard, where they switch outbound cars for KCS to KCS's tracks, pick up Union Pacific and BNSF outbound cars from Zone 1 that KCS switched to Union Pacific's tracks, and then take Union Pacific's and BNSF's outbound cars to North Yard. Other Union Pacific trains perform similar operations, but in the reverse direction: they bring inbound cars from North Yard into Rose Bluff Yard, switch Union Pacific and BNSF inbound cars for Zone 1 to KCS's tracks, pick up KCS inbound cars for Zone 2 that KCS left on Union Pacific's tracks, and take cars down the Lead for delivery to Zone 2 customers.

Union Pacific and KCS must carefully coordinate use of this constrained space to ensure customer service does not suffer. If operations go according to plan, each railroad finishes its work within its window. But plans are often disrupted, resulting in "overstays." Given the volume of cars that must be switched in the Yard and the limited infrastructure, it is not always possible for Union Pacific and KCS to complete their planned work in the Yard in 12 hours. Unanticipated, dynamic operating issues in the Yard or at a customer facility, as well as the need to hold trains heading for or exiting the Yard, can cause overstays for both railroads. A Union Pacific train cannot enter the Yard while KCS is working there (and vice versa). When Union Pacific cannot complete our switching assignments within our scheduled window, we are often able to overstay the window, then allow KCS to overstay its window (and so on). Periodically, the overstays by both railroads accumulate, so the windows are pushed later and later. In some cases, it can take days (or even weeks) for the railroads to "reset" to the planned yard occupancy schedule. Sometimes

overstays are not the most efficient option, and we are unable to complete our switching assignments before we must exit the Yard. Amid all of these complexities, capacity constraints, uncertainties, and deviations from plan, Union Pacific and KCS stay in constant communication to coordinate operations in the Yard.

#### **4. Operations on the Rose Bluff Industrial Lead**

Operations on the Rose Bluff Industrial Lead occur around the clock to serve customers in the southern portion of Zone 1 and all of Zone 2. Union Pacific operates 24 hours a day on the Lead in Zone 2, as shown in Counsel’s Exhibits 4 and 5. During every 24-hour period, Union Pacific operates eight local jobs on the Lead to serve the 14 active customer facilities in Zone 2. This includes trains that remain in Zone 2, switching cars to and from customer facilities; trains that pick up cars that have been set out by the local switching jobs and then move the cars to Rose Bluff Yard and North Yard; and trains that switch inbound cars in Rose Bluff Yard and distribute them to other trains that deliver the cars to customer facilities.

Union Pacific’s daily operations begin with train YRB86, scheduled to be on duty from midnight until noon. YRB86 originates at the southern end of the Rose Bluff Industrial Lead and gradually moves north to Rose Bluff Yard. Its primary function is to pick up outbound cars to be switched to KCS in Rose Bluff Yard or moved on to North Yard for further line-haul movement on Union Pacific or BNSF. Each day, YRB86 picks up an average of approximately 96 cars that have been set out along the Lead by other Union Pacific switching jobs. In light of its function, this job is known as the “reverse spreader.” YRB86 also switches cars at a facility Union Pacific calls Westlake Polymers 3 on the southern end of the Lead. YRB46 relieves YRB86 between 7:00 am and 8:00 am, and completes YRB86’s work, which typically involves finishing moving the

cars gathered by YRB86 up the Lead into Rose Bluff Yard, and from Rose Bluff Yard to North Yard.<sup>2</sup>

Union Pacific train YRB65 comes on duty at 7:59 am, shortly after the beginning of Union Pacific's scheduled window in Rose Bluff Yard.<sup>3</sup> If operations proceed according to plan, KCS has finished working in the Yard when YRB65 comes on duty, and YRB65 begins switching the west end of the Yard. However, if KCS overstays its window, YRB65 cannot begin its work until KCS finishes working in the west end of the Yard. YRB65 builds train blocks for Zone 2 customers by combining and sorting inbound cars KCS crews delivered to Tracks 5 and 6 with cars brought by Union Pacific and also set out on Tracks 5 and 6. YRB65 obstructs Track 4 as it works. Once the blocks are built for Zone 2, typically between 12:00 pm and 2:00 pm (if YRB65 has not been delayed), YRB65 will depart the Yard to the southwest on the Rose Bluff Industrial Lead. This job will then move southbound on the Lead, dropping off blocks of cars at established locations, where they will be picked up later by Union Pacific jobs YRB66, YRB75, and YRB76, which handle industry switching. For this reason, YRB65 is also known as the "spreader." After traversing the Lead, YRB65's engines are taken over by a new crew, at which point the job is redesignated YRB75. The new crew serves shipper facilities at the southern end of the Lead.

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<sup>2</sup> YRB86 previously did not serve customer facilities as it moved up the Lead. The addition of work to YRB86's assignment, and the use of YRB46 to relieve YRB86 (which was made necessary by the additional work assigned to YRB86), reflect an effort to ensure YRB86/46 does not arrive at the Yard until after the end of KCS's window, and to give Union Pacific more leeway to finish its work before the train crew runs out of time, which would often happen because KCS frequently overstays its window in the Yard. To avoid confusion, in discussing train movements, we use YRB86 to refer to both YRB86 and YRB46.

<sup>3</sup> YRB65 previously came on duty at 6:00 am. As with the change to YRB86's assignment and the use of YRB46 to relieve YRB86, the change to YRB65's schedule reflects an effort to give Union Pacific more leeway to finish its work before the train crew runs out of time, which would often happen because KCS frequently overstays its window in the Yard.

If operations proceed according to plan, YRB65 interrupts its work to allow YRB86's entry into Rose Bluff Yard at approximately 8:30 am. YRB86 holds on the Rose Bluff Industrial Lead until it has a clear route to enter the Yard. YRB86 then enters the Yard using the runner track (Track 4) to access the Yard, then pulls into Track 1. If Track 1 cannot accommodate all of the cars YRB86 is pulling, which is often the case, YRB86 will leave a cut of cars on Track 4. YRB86 sets out KCS interchange cars it gathered from Zone 2 onto the yard tracks designated for KCS. YRB86 then picks up any Union Pacific and BNSF cars that KCS brought to Rose Bluff Yard from Zone 1, then departs to North Yard, generally between 11:00 am and 3:00 pm, but sometimes later. YRB86 must arrive in North Yard by 5:00 pm to meet the cut-off time for cars scheduled to be on the next day's manifest train to Beaumont, Texas, and for cars scheduled to be on the next day's manifest train to Alexandria, Louisiana.

If KCS overstays its window and remains in Rose Bluff Yard when YRB86 is ready to enter the Yard, YRB86 must wait on the Rose Bluff Industrial Lead until KCS leaves the Yard, and YRB65 cannot resume switching until YRB86 clears the west end of the Yard.

Between 2:00 pm and 3:00 pm, YAK63 is scheduled to arrive in Rose Bluff Yard from North Yard. YAK63's arrival time varies because it cannot depart North Yard until YRB86 arrives in North Yard and YRB65 exits Rose Bluff Yard over the Rose Bluff Industrial Lead to Zone 2. This ensures YAK63 does not interfere with other traffic on the 50/50 Line while waiting for other jobs to clear Rose Bluff Yard. At times, YAK63 does not arrive in Rose Bluff Yard until after Union Pacific's scheduled occupancy period has ended, and there is no choice but to encroach on KCS's window. YAK63 brings an average of approximately 89 cars a day from North Yard destined for customers in Zones 1 and 2. Depending on when it arrives in Rose Bluff Yard, YAK63

may have time to switch inbound cars for Zone 2 customers to Union Pacific's yard tracks and cars for Zone 1 customers to KCS's yard tracks.

Between 4:00 pm and 12:00 am, YRB74, using the locomotives previously used by YAK63, first completes any switching of inbound cars in Rose Bluff Yard that YAK63 could not complete, then exits the Yard to the south and spots and pulls traffic for LYB and facilities Union Pacific calls Westlake Polymers 1 and 2. At the same time, YRB76 serves customers located south of where YRB74 operates. YRB66 begins working at around 9:00 am to switch shippers on the east end of the Montell Lead. YRB66 delivers inbound cars set out by YRB65, and pulls cars that will be collected by YRB86 the following day. In addition, as noted above, YRB75 takes over from YRB65 in the afternoon and switches customers located on the southern end of the Rose Bluff Industrial Lead. Because YRB75 takes over from YRB65 (using the same locomotives), it cannot begin its assignment to pull outbound cars and spot inbound cars until YRB65 has completed its work in Rose Bluff Yard and moved down the Lead.

## **5. Operations on the Montell Lead and service to LYB**

LYB's Lake Charles area facility is not located directly on the Rose Bluff Industrial Lead. LYB's facility is located on the Montell Lead. The Montell Lead is owned by the Lake Charles Harbor and Terminal District, also known as the Port of Lake Charles. Union Pacific trains access the Montell Lead via Track 800, which connects the Rose Bluff Industrial Lead with the Montell Lead. See Counsel's Exhibit 2.

Union Pacific provides daily service to LYB, using YRB74 to deliver inbound empty cars and pull outbound loaded cars. YRB74 also serves Westlake Polymers 1 and 2. When YRB74 is finished switching in Rose Bluff Yard, it departs the Yard with cars destined to Westlake Polymers 1 and 2 and LYB. YRB74 generally spots empty cars and pulls loaded cars at LYB and Westlake Polymers 1 and 2 between 8:00 pm and 12:00 am. On some days, YRB74 pulls the outbound cars

from LYB and Westlake Polymers 1 and 2 over Track 800 and onto the Rose Bluff Industrial Lead until it clears the switch to Track 800. Once the switch is realigned, YRB74 shoves the outbound cars into Firestone Yard, where they will be picked up the next day by YRB86. Frequently, however, Firestone Yard will not be able to accommodate the cars. On those days, YRB74 will leave the LYB and Westlake Polymers cars, often along with other cars that could not fit in Firestone Yard, on the Montell Lead, where YRB86 will pick them up the next day.

A second train, YRB66, also operates over the Montell Lead, serving shippers at the eastern end of the Lead; namely, Halliburton, Kronos, and the Port of Lake Charles. YRB66 picks up inbound cars YRB65 leaves in Firestone Yard, pulls them north over the Rose Bluff Industrial Lead to clear the switch to Track 800, then shoves the cars down Track 800 and the Montell Lead. YRB66 then switches the three facilities on the Montell Lead and returns with outbound cars. It pulls those cars over the Montell Lead, over Track 800, and onto the Rose Bluff Industrial Lead until it clears the switch to Track 800. Once the switch is realigned, YRB66 shoves the outbound cars into Firestone Yard, where they will be picked up the next day by YRB86.

## **6. Traffic volume to shippers in Zone 2**

In the 12-month period from May 2017 through April 2018, Union Pacific moved {{ }} loaded cars to and from shippers in Zone 2. {{

}} With regard to LYB's traffic, {{

}} See Counsel's Exhibit 6.

### **B. Communications among BNSF, KCS, and Union Pacific regarding BNSF's request to serve LYB using trackage rights**

Union Pacific engaged in timely, good-faith negotiations to accommodate BNSF's desire to directly serve CITGO, and then LYB, in accordance with Decision No. 3. BNSF first sought

direct access to LYB more than four months after the Board's decision in a letter dated November 7, 2016. Three days later, at a meeting scheduled to address BNSF direct access to CITGO, BNSF abandoned its CITGO request and proposed an operating plan to serve LYB instead. On December 7, Union Pacific proposed an alternative operating plan for LYB service. BNSF then took more than two and a half months, until March 1, 2017, to propose a revised plan. Union Pacific, BNSF, and KCS met on March 7 to discuss BNSF's revised plan, and Union Pacific memorialized its response in a letter dated April 21. Union Pacific received no response from BNSF for nearly eight and a half months, until January 10, 2018, when BNSF said it would seek relief from the Board. It did so two days later.

BNSF's sporadic, on-again-off-again communications regarding direct access to LYB show BNSF had little interest in negotiations to establish conditions of use and compensation for that access. Indeed, as BNSF's Petition reveals, BNSF refused to consider constructing additional capacity to facilitate its direct service to LYB. (Petition at 6.) BNSF also refused to consider paying more than the UP/SP merger trackage rights fee as compensation for its use the Rose Bluff Industrial Lead and other terminal facilities jointly owned by KCS and Union Pacific. (*Id.* at 15.)<sup>4</sup>

### **III. BNSF'S PROPOSED OPERATING PLAN IS NOT VIABLE WITHOUT CONSTRUCTION OF ADDITIONAL TRACK CAPACITY.**

Implementation of BNSF's proposed operating plan without construction of additional track capacity would substantially impair service to other shippers on the Rose Bluff Industrial Lead and the Montell Lead. Forcing three railroad into these constrained facilities would create delay and disruption that would spread beyond the Lake Charles area to affect shippers across our

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<sup>4</sup> Because the parties agreed their negotiations would remain confidential, it would not be appropriate to reveal additional details.

network. Section III.A shows BNSF's plan is not viable given existing capacity constraints. Section III.B describes the consequences of authorizing BNSF direct service to LYB.

**A. BNSF's proposed operating plan is not viable.**

BNSF's *own* evidence shows its proposed operating plan is not viable: BNSF cannot directly serve LYB without substantially impairing service to other shippers unless it adds track capacity to the route from Lacassine Yard to LYB.

BNSF's primary support for its plan is a field study conducted in October 2017. However, BNSF's study "[f]ocused on validation of [its] proposed operating plan." (Reilly VS, Ex. A at 4.) As BNSF's Petition makes clear, BNSF designed its study to justify its prior negotiating position. (Petition at 6 n.7.) To further its objective, BNSF analyzed only a portion of the data collected, the portion relating to Rose Bluff Yard. Even with regard to Rose Bluff Yard, BNSF did not accurately identify when the Yard could accommodate a BNSF direct train to LYB.

Despite the study's biased and misleading nature, BNSF's own data show its plan is not viable. BNSF selected a single day from the study for closer scrutiny, but even on that hand-picked day, its default and alternate plans would cause multiple conflicts with existing operations. BNSF says such day-to-day conflicts could be addressed as they arise, through communications among BNSF, Union Pacific, and KCS. However, if BNSF could not design a workable plan for a single, hand-picked day after months of analysis, the Board cannot reasonably conclude that railroad field personnel could magically resolve such issues on the fly.

Union Pacific conducted its own, more rigorous study of potential BNSF direct service to LYB. Our study shows BNSF's proposed operating plan is not viable. Our study confirms additional capacity is needed for BNSF to institute direct service to LYB without substantially impairing service to existing shippers on the Rose Bluff Industrial Lead and the Montell Lead.

We discuss these points in more detail below.

**1. BNSF's field study is misleading and flawed.**

BNSF's falsely claims its field study identified a "Clear Route to Montell Lead" 77.8% of the time. (Reilly VS, Ex. A at 4.) BNSF's calculations are misleading because they address only part of the route a BNSF train would travel: the part through Rose Bluff Yard. Even then, BNSF manipulated the study data to overstate its opportunities to operate through Rose Bluff Yard.

**a) BNSF did not address the relevant route and operating window.**

BNSF's claim of a "clear route" 77.8% of the time should raise red flags. When BNSF previously studied direct service to CITGO, it found that only

} as shown below in **Figure 1**.

**Figure 1**<sup>5</sup> {

}

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<sup>5</sup> Figures 1, 2 and 3 are reproduced from BNSF's CITGO study. BNSF included the material in a document describing its LYB study. We provide the full document as Counsel's Exhibit 7.

Even the { } figure was significantly overstated for at least three reasons. *First*, much of the time was during KCS’s scheduled operating window in Rose Bluff Yard. *Second*, much of the time was concentrated on Saturdays and Sundays. *Third*, the CITGO study did not incorporate information about operations on the 50/50 Line, so it did not reveal whether BNSF trains could operate “barrier free” between Lacassine Yard and Rose Bluff Yard to take advantage of openings in Rose Bluff Yard or on the Rose Bluff Industrial Lead. {

} as shown below in **Figure 2** and **Figure 3**.

**Figure 2** {

}

**Figure 3 {**

**}**

In its LYB study, BNSF engaged in more manipulations to boost the overstated { } to an astonishing – and preposterous – 77.8%. BNSF again included KCS’s operating window, included weekends, and ignored the 50/50 Line. But this time, BNSF included only observations of Rose Bluff Yard. As can be seen below in **Figure 4**, especially in comparison with **Figure 3**, BNSF does not consider blockages of the Rose Bluff Industrial Lead that would prevent its trains from moving to or from Rose Bluff Yard – that is, blockages caused by trains moving into and out of the Yard, and blockages caused by trains switching cars on the Lead at either end of the Yard.

**Figure 4<sup>6</sup> {**

**}**

To be clear, BNSF's LYB study did not identify any changes in the basic operation of Rose Bluff Yard or the Rose Bluff Industrial Lead. BNSF simply ignored blockages that would prevent its trains from entering or exiting the Yard.

BNSF's 77.8% figure is also highly misleading because it does not address blockages of the Montell Lead. BNSF's focus on Rose Bluff Yard and the Rose Bluff Industrial Lead made some sense when BNSF planned to serve CITGO. As discussed above, BNSF's train would move off those commonly used facilities to serve CITGO. However, BNSF cannot switch cars at LYB without occupying the Montell Lead. Any analysis that ignores blockages of the Montell Lead does not address whether BNSF will ever have a clear route between Rose Bluff Yard and LYB.

**b) BNSF's analysis significantly overstates BNSF's opportunities to move through Rose Bluff Yard.**

BNSF's field study not only addresses an incomplete route, BNSF also significantly overstates the opportunities for a BNSF direct train to move through Rose Bluff Yard. A review

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<sup>6</sup> Figure 4 is reproduced from a BNSF workpaper, BNSF-C-0003409 to 3415. We provide the full workpaper as Counsel's Exhibit 8.

of BNSF's study data shows BNSF would rarely, if ever, have a meaningful period of time during Union Pacific's scheduled operating window to move through the Yard.

Despite BNSF misleading interpretation of its study data, which we describe below, BNSF's own summary of its data fatally undermines its proposed operating plan. In its plan, BNSF says it will serve LYB "[f]rom approximately 0930 to approximately 1130" and "depart by approximately 1300." (Reilly VS, Ex. A at 3.) However, BNSF's summary, which is reproduced below in **Figure 5**, shows Rose Bluff Yard was blocked for 9 of the 10 available hourly slots from 1200 through 1400 on Monday through Friday. Only once, on Monday from 1300 to 1400, could BNSF's train return through Rose Bluff Yard as proposed in its plan. In other words, BNSF was writing on a clean slate, yet it proposed an operating plan flatly inconsistent with the results of its own study.<sup>7</sup>

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<sup>7</sup> Even the limited opening on Monday from 1300 to 1400 might not exist, because BNSF did not consider blockages on the Montell Lead, the Rose Bluff Industrial Lead, and the 50/50 Line.

**Figure 5<sup>8</sup> {**

**}**

Additionally, BNSF used two tricks in interpreting its study data to overstate substantially the time Rose Bluff Yard was accessible.

*First*, BNSF did not constantly observe operations in Rose Bluff Yard or on the Montell Lead. BNSF observers apparently moved back and forth between locations. However, when BNSF observers considered the Yard accessible at Time X and Time X+2, but recorded no observation at Time X+1, BNSF assumed the Yard was accessible at Time X+1, even in the face of contrary evidence. Similarly, when BNSF observers considered the Yard accessible at Time X and blocked

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<sup>8</sup> Figure 5 is reproduced from the same BNSF workpaper as Figure 4. See Counsel's Exhibit 8. BNSF apparently created the summary in Figure 5 using a typewritten compilation of notes reflecting observations made during its study. We provide the typewritten notes as Counsel's Exhibit 9. BNSF apparently used the data in Figure 5 to create the chart reproduced in Figure 4.

In BNSF's summary, "1" means BNSF considered Rose Bluff Yard to be "accessible"; "6" means BNSF concluded Rose Bluff Yard was "blocked"; "7" means BNSF failed to record an observation. BNSF used the same symbols used in its CITGO study. See Counsel's Exhibit 8.

at Time X+2, but recorded no observation at Time X+1, BNSF assumed the Yard was accessible at Time X+1, even in the face of contrary evidence.

*Second*, when BNSF observers noted Rose Bluff Yard was blocked for part of an hour, but not a full hour, BNSF consistently treated the Yard as accessible for the full hour.

We illustrate these tricks using BNSF's study data from October 3 – BNSF's hand-picked day for illustrating its proposed operating plan. A careful review of BNSF's data shows Rose Bluff Yard likely could not have accommodated a BNSF direct train to and from LYB during Union Pacific's scheduled occupancy window on October 3.

{

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<sup>9</sup> When observing activity in Rose Bluff Yard, BNSF focused on Tracks 1 and 4. As discussed above, Track 4 is the runner track. Track 1 is often clear when KCS departs the Yard, and Union Pacific YRB86 often pulls into Track 1 when it enters the Yard after moving up the Rose Bluff Industrial Lead before it begins switching cars in the Yard. Tracks 2, 3, 5, and 6 are generally impassible because they are used continuously to hold and switch cars, or they are blocked by switching activity on Track 4 or the Lead, as BNSF's study implicitly acknowledges.

<sup>10</sup> The textual excerpts in this section and the following sections were copied from BNSF's typewritten notes of study observations. See Counsel's Exhibit 9.



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<sup>11</sup> See BNSF Rebuttal in Support of Application for Terminal Trackage Rights, Bredenberg Reb. VS at 2 (“With respect to UP’s operations on the Rose Bluff Lead, I will stipulate . . . that UP uses all of the yard tracks when its crews are switching cars during UP’s 12-hour operating period in the Rose Bluff Yard.”).

<sup>12</sup> BNSF refers to YRB46, rather than YRB86. As discussed above, YRB46 relieves YRB86 between 7:00 am and 8:00 am. See Section II.A.4, *supra*.

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<sup>13</sup> See note 11, *supra*.

}

Additionally, as discussed above, BNSF’s study summary ignored instances when Rose Bluff Yard was not accessible because of blockages on the Rose Bluff Industrial Lead. BNSF tried to fill this gap using a witness who relied on KCS data from 2014 that identified trains entering and exiting the Yard. (Baranowski VS at 12-16.)<sup>14</sup> But why did BNSF prefer old KCS data to its own observations from 2017? Perhaps because the KCS data show only when trains entered or exited the Yard, so BNSF’s witness was “forced” to assume no trains block the Lead for meaningful periods before entering the Yard, and no trains block the Lead while performing work and never enter the Yard. Yet, BNSF observers noted examples of both situations on October 3.

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<sup>14</sup> We discuss Mr. Baranowski’s statement in more detail below in Section III.A.2.c.

{

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<sup>15</sup> In any event, BNSF appeared to disregard the conclusions of its own witness.

} See **Figure 5**.

}

In sum, BNSF's study data show a clear route between Rose Bluff Yard and the Montell Lead likely did not exist for any meaningful period of time between 0600 and 2215 on October 3. This fatally undermines the credibility of BNSF's proposed operating plan, even before considering blockages on the Montell Lead and the 50/50 Line.

**2. BNSF's proposed operating plan and illustrative animation are fantasies.**

Even setting aside the flaws in BNSF's interpretation of its study data, BNSF's proposed operating plan blinks at reality. Its animation contains no information that helps validate the plan. As BNSF acknowledges, the animation: "(1) . . . *does not* portray any definitive start or stop times for each movement; (2) *does not* depict locomotives, cars, and the relative location of track facilities at scale; and (3) *does not* depict the locomotives performing any stopping or starting motions that may be necessary in order to throw switches along the route." (BNSF Petition at 9 n.10, emphasis added.)<sup>16</sup> After those massive hedges and categorical disclaimers, one might understandably ask the question: what's left?

Union Pacific tested BNSF's proposed operating plan by analyzing (1) operations on October 3 from Lacassine Yard to LYB, and (2) operations from October 2 through October 6 on the Montell Lead. We focused on October 3 because BNSF chose to illustrate "two alternatives for BNSF service . . . based on the actual traffic observed on October 3, 2017." (Reilly VS at 11.) We focused on the Montell Lead because it presents operating challenges that were not relevant in addressing BNSF's now-abandoned proposal for direct service to CITGO.

Union Pacific also tested BNSF's proposed operating plan using data from February 21, 2018. Using a more recent day allowed us to provide the Board more detailed information regarding operations in Rose Bluff Yard than is available for October 2017.

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<sup>16</sup>

We  
provide the referenced document as Counsel's Exhibit 10.

In all instances, Union Pacific's analysis shows BNSF operations would have caused multiple conflicts with other operations between Lacassine Yard and LYB – conflicts BNSF was unable to avoid despite months of planning. These conflicts would have substantially impaired service to other shippers on the Rose Bluff Industrial Lead and the Montell Lead.

**a) BNSF's proposed operations would have created multiple conflicts on October 3.**

BNSF's own study data show BNSF's proposed operating plan would not have worked on October 3. BNSF's plan would have created multiple conflicts with existing operations on the route from Lacassine Yard to LYB. First, we first discuss BNSF's basic operating plan. Next, we discuss BNSF's more specific alternatives, which we also address with our own animation.

**(1) BNSF's basic operating plan would have failed.**

BNSF's own study data show BNSF direct service to LYB would have created multiple conflicts with actual operations on October 3. BNSF's animation does not show these conflicts because it does not show the actual timing of BNSF's proposed service in relation to existing operations, and it does not show all existing operations on the route from Lacassine Yard to LYB.

**Conflict 1.** BNSF's plan says its LYB train would depart from Lacassine Yard by 0730, after KCS departs Rose Bluff Yard. (Reilly VS, Ex. A at 2.) However, BNSF's observations show {

}

BNSF's animation does not show this conflict because it shows BNSF's LYB train entering Rose Bluff Yard after KCS has departed.

**Conflict 2.** BNSF's plan says its LYB train would arrive at LYB at approximately 0930. (Reilly VS, Ex. A at 2.) However, even assuming BNSF could have moved through Rose Bluff

Yard despite the presence of KCS, BNSF's observations show {

}

BNSF's animation does not show this conflict because it does not show cars on the Montell Lead when BNSF's LYB train was moving to LYB.

**Conflicts 3, 4 & 5.** BNSF's plan says its LYB train would serve LYB from approximately 0930 to 1130 and prepare to depart by approximately 1300. (Reilly VS, Ex. A at 3.) However, even assuming BNSF could have commenced serving LYB at 0930 despite the presence of cars on the Montell Lead, BNSF's observations show {

}

BNSF's animation does not show these conflicts. It does not show YRB86 removing cars from the Montell Lead. It also inaccurately shows YRB66 moving east over the Montell Lead before BNSF's arrival at LYB, and it inaccurately shows YRB66 remaining on the east end of the Lead until after BNSF's departure from LYB.

**Conflict 6.** BNSF's plan says its LYB train would leave LYB by approximately 1300. (Reilly VS, Ex. A at 3.) However, even assuming BNSF could have served LYB and been prepared to depart by 1300 { }<sup>17</sup> BNSF's observations show {

}

---

<sup>17</sup> As discussed in more detail below in Section III.A.2.b, BNSF's operating plan presumes BNSF will occupy the Montell Lead while it serves LYB. *See also* Reilly VS, Ex. A at 3 (describing BNSF's proposed use of the Montell Lead to spot and pull cars at LYB).

BNSF's animation does not show this conflict. It shows YRB86 moving up the Rose Bluff Industrial Lead to Rose Bluff Yard without holding on the Lead, and it shows YRB86 departing from the Yard before BNSF's LYB train even departs from LYB.

In sum, BNSF would have caused six separate conflicts with existing operations had it tried to follow its *own* basic operating plan on October 3, including conflicts entering Rose Bluff Yard, conflicts entering the Montell Lead, conflicts while serving LYB from the Montell Lead, and conflicts returning to Rose Bluff Yard. BNSF's animation shows none of these conflicts.

**(2) BNSF's special options would have failed.**

BNSF apparently recognized its basic operating plan had significant failings, so it proposed two more specific options, purportedly "based on the actual traffic observed on October 3, 2017." (Reilly VS at 11.) However, use of either option would have caused multiple conflicts on October 3. Here, we focus on Option 1.<sup>18</sup> We are also submitting an animation to show the conflicts BNSF's use of Option 1 would have caused on October 3. *See* Counsel's Exhibit 11. Unlike BNSF's animation, our animation reflects *actual* train movements and shows when those movements *actually* occurred. Union Pacific's animation relies mainly on our own sources of operating data to identify conflicting movements, but the conflicts can also be identified from BNSF's own observations:

**Conflict 1.** BNSF's plan says its LYB train would move through Rose Bluff Yard on Track 1 at 0836. However, as discussed above, BNSF's observations show {

---

<sup>18</sup> Option 2 would create conflicts that overlap the conflicts discussed in connection with BNSF's basic plan and Option 1.

}

**Conflicts 2 & 3.** BNSF's plan says its LYB train would move down the Rose Bluff Industrial Lead to the Montell Lead and begin service to LYB by 0900. However, even assuming BNSF could have moved through Rose Bluff Yard despite the presence of KCS, BNSF's observations show {

}

**Conflicts 4 & 5.** BNSF's plan says its LYB train would serve LYB from 0900 to 1100. However, even assuming BNSF could have begun serving LYB at 0900 {

} BNSF's observations show

{

}

**Conflicts 6 & 7.** BNSF's plan says its LYB train would depart from LYB at 1100, arrive at Rose Bluff Yard at 1124, and depart from the Yard at 1145. However, even assuming BNSF could have been prepared to depart LYB by 1100 {

} BNSF's observations show {

}

**Conflict 8.** BNSF's plan says its LYB train would depart from Rose Bluff Yard at 1145 and move over the 50/50 Line to Lacassine Yard by 1216. However, even assuming BNSF could have departed from Rose Bluff Yard at 1145 despite the issues discussed above, BNSF's LYB train would have created a conflict with another train, Union Pacific train MAVIEW, which was

moving westbound on the 50/50 Line between the Rose Bluff Industrial Lead and Lacassine Yard at 1154.<sup>19</sup>

In sum, BNSF's attempt to develop a carefully tailored operating plan to address a single day – a day BNSF presumably selected to put its best case forward – served only to show, ironically, that a BNSF direct train to LYB would create multiple conflicts with existing operations between Lacassine Yard and LYB. Attempting to change Union Pacific, BNSF, or KCS operating plans on the fly to address any particular conflict would create a cascade of new conflicts that could spread beyond the Lake Charles area to affect shippers across our network.

**b) Operations on the Montell Lead pose particularly intractable problems for BNSF direct service to LYB.**

BNSF's failure to propose a viable operating plan is especially clear in connection with operations on the Montell Lead. BNSF presumes it could enter the Montell Lead on demand and block the Lead for the whole time it serves LYB and waits for an opportunity to move back to and through Rose Bluff Yard. (*See* Reilly VS at 7-8; *id.*, Ex. A at 3.)

However, BNSF's own study shows its LYB train would cause multiple conflicts every day with current operations on the Montell Lead. BNSF acknowledges these conflicts only in passing, and its proposed solutions are entirely inadequate.

**(1) BNSF's own study shows multiple conflicts every day on the Montell Lead.**

BNSF's operating plan requires the Montell Lead to be clear when its LYB train arrives, and to remain clear while it serves LYB. BNSF claims the "Montell Lead [is] generally clear during the morning and mid-day time periods when the BNSF trains would proceed to and depart

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<sup>19</sup> BNSF's written description of Option 1 recognizes the existence of MAVIEW by identifying the lead locomotive, UP4863, but BNSF wrongly assumed the train passed Rose Bluff Yard before BNSF's LYB train would have entered the 50/50 Line. (*See* Reilly VS, Ex. A at 7.)

from the LyondellBasell facility.” (Reilly VS at 11.) However, BNSF’s own study data belie that claim. BNSF’s proposed operations on the Montell Lead to serve LYB would substantially impair service to other shippers located near and on the Lead.

BNSF’s proposed operations would conflict with existing uses of the Montell Lead in four ways:

*First*, the Montell Lead is frequently used to stage cars gathered overnight from nearby customers. The cars are gathered by two trains, YRB66 and YRB74, and are placed on the western portion of the Montell Lead, blocking access between the Rose Bluff Industrial Lead and LYB. Their presence would prevent BNSF from moving from the Rose Bluff Industrial Lead to the Montell Lead. BNSF observed {

}

*Second*, when cars are stored on the Montell Lead, they must be picked up and moved to Rose Bluff Yard (with other cars gathered from Firestone Yard). These cars are picked up and moved by YRB86. BNSF could not move onto the Montell Lead until YRB86 picks up these cars. (If the cars were stored on the eastern portion of the Montell Lead to give BNSF access to LYB, BNSF would have to stop switching LYB to allow YRB86 down the Lead and back to pick up the cars.) Again, BNSF observed {

}

*Third*, YRB66 regularly moves over the Montell Lead in the middle of the morning to serve customers on the east end of the Lead, primarily Haliburton, Kronos, and the Port of Lake Charles. Again, BNSF observed {

}

*Fourth*, YRB66 regularly moves back over the Montell Lead later in the morning, after serving customers on the east end of the Lead. BNSF also observed {

}

BNSF's own study data show these issues would have arisen on Monday through Friday during the same week observed by BNSF. That is, BNSF could not have occupied the Montell Lead from 0930 to 1300 as proposed in its basic operating plan, from 0900 to 1100, as proposed in its Option 1, or from 1040 to 1250, as proposed in its Option 2, without substantially interfering with service to shippers other than LYB who use the Montell Lead.

On **Monday**, the Montell Lead was blocked by staged cars from {

}

YRB66 then operated on the Montell Lead between {

}

On **Tuesday**, the Montell Lead was blocked by staged cars from {

}

YRB66 then operated on the Montell Lead between {

}

On **Wednesday**, the Montell Lead was blocked by staged cars from {

}

YRB66 then operated on the Montell Lead between {

}

On **Thursday**, the Montell Lead was blocked by staged cars from {

}

BNSF's recorded observations {

}

On **Friday**, BNSF's observations are confusing, but they show {

---

<sup>20</sup> BNSF's 0700 observation

}

**(2) BNSF's proposals for addressing the consistent conflicts on the Montell Lead are not viable solutions.**

BNSF barely acknowledges these conflicts, which stem from its need to occupy the Montell Lead for several hours each day to serve LYB when Union Pacific trains are actively operating on the Montell Lead. BNSF says “the BNSF direct service train could either precede YRB66 onto the Montel Lead (Option 1), or the BNSF train could delay its departure from Rosebluff Yard to enable YRB66 to enter the Montell Lead before the BNSF train (Option 2). The same basic options are available for the return trip by the BNSF train.” (Reilly VS at 11.) However, BNSF’s proposed options do not provide viable solutions.

BNSF cannot precede YRB66 onto the Montell Lead (Option 1) if cars are staged on the Lead, and BNSF’s study shows cars typically remain on the Lead until mid-morning. Even once YRB86 removes the cars, if BNSF precedes YRB66 down the Lead, it would then block YRB66 from serving customers on the east end of the Lead.

BNSF's proposal to trail YRB66 (Option 2) also is not a viable solution. BNSF would spend even more time blocking Rose Bluff Yard (waiting for YRB66 to move down the Montell Lead), thus reducing the time available to switch cars in the Yard and creating cascading delays that would affect BNSF's ability to return during Union Pacific's operating window. Also, if BNSF gets a late start switching LYB, it is even more likely to be blocking the Montell Lead when YRB66 returns from serving customers on east end of the Lead.

BNSF offers no better solution when it suggests it could allow YRB66 to pass its LYB train on the Montell Lead by interrupting its service to LYB and "clear[ing] the Montell Lead for 15-30 minutes." (Reilly VS at 12.) BNSF may not be able to clear the Lead, depending on the number of cars it is picking up and setting out at LYB.<sup>21</sup>

Even if BNSF could clear the Lead to allow YRB66 to pass, BNSF understates the time involved and ignores the downstream consequences. If BNSF leaves cars on the Montell Lead while it is working on LYB's tracks, as its operating plan contemplates, it could take as long as one hour to (i) cut power from cars it is switching in LYB's facility and tie hand brakes on the cars, (ii) return to the Montell Lead, couple in to the cars on the Lead and untie hand brakes, (iii) move those cars into LYB's facility, (iv) allow YRB66 to pass, (v) pull the cars it cleared back out of LYB's facility, (vi) return the cars to the Lead, (vii) cut power from those cars and tie hand brakes on the cars, (viii) return to LYB's facility, and (ix) couple in to the cars it had been

---

<sup>21</sup> Documents BNSF produced in discovery show that,

} See Counsel's Exhibit 10 (BNSF-C-0003092, 3093). However, as discussed above, Union Pacific uses the Montell Lead to stage cars from shippers other than LYB, so conflicts will continue to arise if BNSF institutes direct service to LYB.

switching before the interruption and untie hand brakes. This additional activity would significantly delay YRB66. It could also extend BNSF's time on the Montell Lead well past its proposed 1300 departure, leading to more conflicts with YRB65, which would be switching cars in Rose Bluff Yard or moving down the Rose Bluff Industrial Lead and thus blocking the route from the Montell Lead to Rose Bluff Yard.<sup>22</sup>

**c) BNSF's evidence based on 2014 operating data undercuts BNSF's proposed plan to directly serve LYB.**

BNSF says it used its October 2017 field study to validate its proposed operating plan, but it also submitted a statement from a witness who performed a series of analyses using data from 2014. The witness, Baranowski, claims his analyses show capacity exists to accommodate BNSF's proposed service to LYB. However, his analyses actually show Rose Bluff Yard, the Rose Bluff Industrial Lead, and the Montell Lead could not accommodate BNSF direct service to LYB during the times proposed in BNSF's operating plan.

**(1) BNSF's evidence shows Rose Bluff Yard does not have enough available openings to accommodate BNSF direct service to LYB.**

Baranowski's first analysis identified available openings in Rose Bluff Yard for BNSF direct service to LYB. (Baranowski VS at 2-5.) It shows such openings rarely exist. Baranowski found openings required by BNSF's proposed operating plan on just {{

}} Moreover, his analysis addressed only Rose Bluff Yard. It did not consider whether an

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<sup>22</sup> BNSF's field study did not focus on blockages on the Rose Bluff Industrial Lead that would preclude its LYB train from moving from the Montell Lead to Rose Bluff Yard, but YRB65 is scheduled to depart Rose Bluff Yard between 1200 and 1400, at which point it would block the Rose Bluff Industrial Lead as it moves down the Lead setting out cars. *See* Section II.A.4, *supra*. In addition, if BNSF must hold on the Montell Lead while YRB65 moves down the Rose Bluff Industrial Lead, BNSF attempt to move into Rose Bluff Yard and over the 50/50 Line could conflict with YAK63, which is scheduled to move from North Yard into Rose Bluff Yard between 1400 and 1500. *See id.*

LYB train could have moved over the 50/50 Line, the Rose Bluff Industrial Lead, or the Montell Lead to take advantage of openings in the Yard. Baranowski's analysis thus provides no evidence BNSF's plan would ever work.

To identify available openings in Rose Bluff Yard, Baranowski used Union Pacific and KCS data showing when trains entered and exited the Yard. His results, reproduced below in **Figure 6**, show the futility of BNSF's plan to pass through the Yard en route to LYB each day between 0730 and 0930, and to return through the Yard on the same day during Union Pacific's scheduled operating window in the Yard.

**Figure 6**<sup>23</sup> {{

}}

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<sup>23</sup> **Figure 6** is a reproduction of Baranowski VS at 5, Figure 3. Baranowski's Figure 1 is a disaggregated view of some of the information he used to create his Figure 3. Baranowski's Figure 2 also addresses occupancy of Rose Bluff Yard, but not whether the Yard was occupied when BNSF proposes to move its LYB train through the Yard.

As shown in **Figure 6**, Baranowski identified openings in Rose Bluff Yard (green segments) between 0730 and 0930 on just {{ }}<sup>24</sup> On {{ }} he found no opening until after 1200.<sup>25</sup> On {{ }} he found an opening between 0930 and 1200,<sup>26</sup> but on {{ }}<sup>27</sup> the opening was shorter than the 31 minutes BNSF’s witness says the LYB train would need to depart Lacassine Yard and arrive at the Rose Bluff Industrial Lead. (Reilly VS at Ex. A at 5.)

Of course, BNSF’s plan also requires the LYB train to return through Rose Bluff Yard after serving LYB. However, on {{ }} on which Baranowski identified a yard opening between 0730 and 0930, {{ }} a return opening during Union Pacific’s window.<sup>28</sup> On {{ }} on which Baranowski identified an opening of more than 31 minutes between 0930 and 1200, {{ }} a return opening during Union Pacific’s window.<sup>29</sup>

In sum, Baranowski identified Rose Bluff Yard openings required by BNSF’s proposed operating plan on only {{ }} Even broadening the search for morning openings to 1200, Baranowski identified two openings per day on only {{ }} Baranowski’s analysis plainly does not support BNSF’s plan to operate its LYB train twice a day through Rose Bluff Yard.

---

<sup>24</sup> {  
 }

<sup>25</sup> {{  
 }}

<sup>26</sup> {  
 }}

<sup>27</sup> {{  
 }}

<sup>28</sup> {{  
 }}

<sup>29</sup> {{  
 }}

**(2) BNSF's calculation of theoretical yard capacity does not address whether Rose Bluff Yard could accommodate BNSF direct service to LYB.**

Perhaps recognizing his first analysis was a failure, Baranowski performed a second analysis aimed at addressing occupancy of Rose Bluff Yard: he counted the number of cars in the Yard each hour, then calculated how many yard tracks would remain free, if other tracks were filled to capacity with the cars. (Baranowski VS at 9-12.) However, Baranowski's simplistic mathematical exercise does not address the viability of BNSF's plan to operate an LYB train through the Yard.<sup>30</sup>

Baranowski's exercise is divorced from reality. The fundamental flaw can be illustrated using a situation that arises every day in Rose Bluff Yard. As discussed above, when YRB86 enters the Yard with more cars than can fit on Track 1 – a common occurrence – it leaves a cut of cars on Track 4. *See* Section II.A.4, *supra*. At that point, BNSF could not move through the Yard on Tracks 1 or 4. Even if Tracks 2, 3, 5 and 6 are not full and could collectively accommodate the additional cars from YRB86, YRB86 will occupy Tracks 1 and 4 as it switches cars to other tracks (*i.e.*, for interchange with KCS), and picks up cars from other tracks (*i.e.*, KCS cars for Union Pacific or BNSF), before moving on to North Yard. Yet Baranowski would wrongly conclude the Yard could accommodate BNSF.

Similarly, when YRB65 builds a train on Track 4 for movement to customers on the Rose Bluff Industrial Lead by switching cars from other tracks in Rose Bluff Yard, BNSF could not move through the Yard on the runner track. Plainly, the cars YRB65 switches could fit back on the tracks they came from, but Track 4 will be occupied while YRB65 builds the train. Yet,

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<sup>30</sup> Consequently, we have not reviewed Baranowski's workpapers to check whether he correctly identified the total number of cars in the yard or to check any of his other calculations.

Baranowski would wrongly conclude the Yard could accommodate BNSF. YRB65 could be delayed by up to 60 to 70 minutes if BNSF enters the yard while YRB65 is switching. YRB65 uses all the yard tracks to sort cars and uses the track leads as head room for these moves. At any given time, YRB65 may be coupled into a cut of cars that cannot fit into one track, depending on the number of cars in the cut and the number of cars already in a track. This would require YRB65 to switch the cars into multiple tracks to allow the locomotive to clear the leads and allow a route through the Yard.

Along the same lines, Tracks 2, 3, 5 and 6 often are not full at the same time. Except for cars YRB86 moves from shippers on the Rose Bluff Industrial Lead to North Yard, when Union Pacific and KCS bring cars into Rose Bluff Yard, the cars are typically switched to one of those tracks, depending on their next scheduled movement, so they can more readily be assembled into trains. It would be less efficient to fill each track to capacity before starting to fill another track, blending cars that will next move via Union Pacific to a shipper in Zone 2, cars that will next move via KCS to a shipper in Zone 1, and cars that will next move via Union Pacific to North Yard. Baranowski's analysis incorrectly treats efficient use of tracks to sort cars as wasted capacity. Moreover, as discussed above, the existence of such theoretical capacity does not mean the Yard could accommodate BNSF. As an example, if Tracks 2 and 6 are half-full at a particular time, combining their cars on a single track would not mean the Yard could accommodate an LYB train if the runner track is occupied. Baranowski would once again come to the wrong conclusion.

Simply stated, Rose Bluff Yard's tracks are not fungible capacity. They have separate functions that allow the Yard to operate efficiently. Trains must enter and exit the Yard on Track 4, and when cars are brought into the Yard, they are placed on other tracks based on their next scheduled movement, so they can be readily assembled into new trains. Rose Bluff Yard's capacity

to accommodate a BNSF direct train to LYB cannot be analyzed as though cars are packed into yard tracks like sardines in a can.

**(3) BNSF's initial analysis of Rose Bluff Industrial Lead occupancy windows confirms BNSF direct service to LYB would interfere with Union Pacific operations on the Montell Lead.**

Baranowski's third analysis purported to address whether an LYB train could move over the Rose Bluff Industrial Lead, assuming it could pass through Rose Bluff Yard. However, the analysis does not serve that purpose, because it completely ignores movements of three Union Pacific trains that operate on the Lead every day: YRB86, which moves up the Lead to the Yard every morning with cars collected from customers on the lead; YRB65, which switches cars in the Yard every morning, then moves down the Lead, setting out cars along the way; and YAK63, which switches traffic in North Yard every morning, then moves over the 50/50 Line and down the Lead into Rose Bluff Yard in the afternoon. Instead, Baranowski's analysis identified times when other Union Pacific jobs were switching cars at customer facilities. (Baranowski VS at 5-7 & Table 1.)

Baranowski's third analysis is, however, somewhat relevant in one respect: it confirms YRB66 regularly moves over the Montell Lead to serve shippers on the east end of the Lead when BNSF's train would be serving LYB or staged at on the Lead waiting for openings to return to Lacassine Yard. (Baranowski VS at 6, Table 1.)

**(4) BNSF's supplemental analysis of Rose Bluff Industrial Lead occupancy shows multiple opportunities for operating conflict, assuming BNSF's LYB train could travel through Rose Bluff Yard.**

Perhaps recognizing the major deficiencies in his initial analysis of Rose Bluff Industrial Lead, Baranowski performed an additional analysis: he recorded the times Union Pacific trains

passed an automated equipment reader located outside the south end of Rose Bluff Yard. Baranowski claims he found little activity on the Rose Bluff Industrial Lead that would prevent an LYB train from moving between Rose Bluff Yard and Montell Lead. (Baranowski VS at 14.) However, his results, reproduced below in **Figure 7**, contradict his claim.

**Figure 7**<sup>31</sup> {{

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BNSF's plan calls for the LYB train to pass through Rose Bluff Yard and continue to the Montell Lead between 0730 and 0930. However, as shown in **Figure 7**, even if the Yard had an available opening (true on only {{ }} as shown above in Section III.A.2.c.1), the LYB train would have to contend with YRB86 moving into the Yard from Rose Bluff Industrial Lead between 0800 and 1000 on all but {{ }}<sup>32</sup> In other words, even if BNSF could move into the Yard, it could not move out, because the Lead would be occupied by YRB86. Moreover, Baranowski's data show only when YRB86 passed the automated equipment reader

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<sup>31</sup> **Figure 7** is a reproduction of Baranowski VS at 14, Figure 6.

<sup>32</sup> Baranowski used different time periods for his two analyses, so BNSF cannot show there was any day on which its LYB train would have had a clear path through Rose Bluff Yard *and* on the Rose Bluff Industrial Lead, as required by its proposed operating plan.

outside the south end of the Yard – they do not show how long YRB86 blocked the lead as it switched shippers or waited for space in the Yard. In fact, YRB86 was likely occupying the Lead for a substantial period before it passed the reader. Baranowski claims blockage of the Lead would be minimal, because a train should not take long to move up the Lead. (Baranowski VS at 14-15.) However, Baranowski fails to recognize YRB86 would hold on the Lead if KCS were occupying Rose Bluff Yard, and KCS often remains in the Yard after its scheduled switching window.<sup>33</sup>

Perhaps recognizing his data undermine BNSF's plan, Baranowski also presents a modified version of his results, purportedly to reflect BNSF's observations during its October 2017 field study that YRB86 arrived in Rose Bluff Yard closer to 1100 than the 0800 to 0900 arrival times most frequently observed in April 2014. However, YRB86 is scheduled to arrive at Rose Bluff Yard at approximately 0830. As discussed above, Union Pacific and KCS often overstay their scheduled switching windows, and the overstays accumulate, so the windows are pushed later and later. In other words, YRB86 arrives late in the Yard when KCS works late in the Yard, but that means the Yard could not accommodate a BNSF direct train to LYB. Moreover, even if BNSF could make it through the Yard and over the Lead to LYB in the morning, YRB86's later movement up the Lead into the Yard, and its switching activities in the Yard, would block BNSF when the LYB train tries to return to Lacassine Yard. Such conflicts are shown in Union Pacific's animations of operations on October 3, 2017, and February 21, 2018.

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<sup>33</sup> BNSF observers in October 2017 recognized KCS regularly overstayed its scheduled switching window. See Counsel's Exhibit 9. A BNSF observational study from October 2015 made the same point. See Counsel's Exhibit 12 {

}

**d) Union Pacific's study confirms BNSF's proposed operating plan is not viable.**

Union Pacific conducted its own study to test BNSF's proposed operating plan. In our study, we used operating data from February 21, 2018. We selected February 21 based on data availability. When we started our analysis, we did not know what the data would show. Using February 21 allowed us to include detailed information regarding operations in Rose Bluff Yard that was not available for October 3, 2017. Rather than rely on periodic observations, we used a continuous video recording of Yard activity to establish more definitively whether and when yard tracks would have been available to BNSF. We also use dispatching records, fixed trackside readers, and mobile devices to determine when trains occupied the 50/50 Line between Iowa Junction and North Yard, and between North Yard and the Rose Bluff Industrial Lead; we used bridge tender records to identify openings of the swing bridge over Calcasieu River; and we used train telemetry data to determine when trains occupied the Rose Bluff Industrial Lead and connecting industry tracks, including the Montell Lead. The results are presented in Counsel's Exhibit 13.

In the following discussion, we focus on how our study highlights the flaws in BNSF's Option 1. But our conclusions apply equally to BNSF's more general proposal as well as its Option 2. We are also submitting an animation to show the conflicts BNSF's LYB train would have caused on February 21. See Counsel's Exhibit 11.

**Conflict 1.** BNSF's plan says its LYB train would depart Lacassine Yard at 0805 and arrive at the Rose Bluff Industrial Lead by 0836. However, at 0810 on February 21, Union Pacific's bridge department issued a work permit for the 50/50 Line west of North Yard that required all trains to stop before they reached the swing bridge over the Calcasieu River. The work permit

would have precluded BNSF's LYB train from moving over the swing bridge and arriving at Rose Bluff Industrial Lead by 0836.

**Conflict 2.** BNSF's plan says its LYB train would move through Rose Bluff Yard on Track 1 at 0836. However, even assuming BNSF would have ignored the work permit, Union Pacific's study shows KCS was still switching cars in the Yard at 0836, and none of the yard tracks could have accommodated BNSF direct train to LYB. BNSF's LYB train could not have moved through Rose Bluff Yard at 0836.

In fact, Union Pacific's study shows BNSF's LYB train could not have moved through Rose Bluff Yard between 0600 and 1330. KCS was actively switching in the east end of Yard between 0600 and 1130, occupying the lead track between the 50/50 Line and the Yard and blocking tracks in the Yard for most of that time, and all the Yard tracks were blocked by cars from 0800 until 1330.<sup>34</sup> We provide still-frame pictures taken from video recordings by cameras stationed at the north (east) and south (west) ends of the Yard as Counsel's Exhibit 14. The still-frame pictures, presented at 15-minute increments, show the occupancy status of the Yard between 0600 and 1800 – Union Pacific's scheduled occupancy window.

**Conflict 3.** BNSF's plan says its LYB train would move down the Rose Bluff Industrial Lead to the Montell Lead and begin service to LYB by 0900. However, even assuming BNSF could have moved through Rose Bluff Yard while all the yard tracks were occupied, Union Pacific's study shows the Montell Lead was occupied at 0900 by YRB86. YRB86 was on the Montell Lead between 0850 and 0945 picking up cars that had been staged on the Lead earlier that

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<sup>34</sup> The only exception is that Track 1 was open between 1125, when KCS departed the Yard, and 1133, when Union Pacific train YRB86 entered the Yard. However, BNSF could not have moved through the Yard because YRB86 was still occupying the Rose Bluff Industrial Lead south of the Yard as it moved into the Yard.

morning by YRB74. As discussed above, YRB74 routinely stages cars on the Montell Lead, where they block access to LYB until they are removed by YRB86. YRB86's operations on the Montell Lead would have precluded BNSF's LYB train from moving over the Lead and commencing service to LYB.

**Conflict 4.** BNSF's plan says its LYB train would serve LYB from 0900 to 1100. However, even assuming BNSF could have begun serving LYB at 0900 despite YRB86's operations on the Montell Lead, Union Pacific's study shows YRB66 entered the Lead at 1000 and travelled down the Lead to serve customers on the east end of the Lead. YRB66 could not have passed LYB to serve customers on the east end of the Lead while BNSF's LYB train was switching cars at LYB.

**Conflict 5.** BNSF's plan says its LYB train would depart from LYB at 1100, and arrive at Rose Bluff Yard at 1124. However, even assuming BNSF could have departed LYB by 1100 despite the earlier conflicts, Union Pacific's study shows BNSF's LYB train did not have a clear route to Rose Bluff Yard. Instead, YRB86 was holding on the Rose Bluff Industrial Lead from 1025 until 1130, waiting for an open track so it could move into Rose Bluff Yard. YRB86 then moved into Rose Bluff Yard, where it switched cars until it departed at 1330. If BNSF's LYB train had operated according to BNSF's plan, it would have created a conflict with YRB86 on the Rose Bluff Industrial Lead and in Rose Bluff Yard.

**Conflict 6.** BNSF says its LYB train would depart from Rose Bluff Yard at 1145 and move over the 50/50 Line to Lacassine Yard by 1216. However, even assuming BNSF could have departed Rose Bluff Yard at 1145 despite the issues discussed above, Union Pacific's study shows BNSF's LYB train did not have a clear route to Lacassine Yard. Instead, Union Pacific train YAK64 was occupying the 50/50 Line at the same time BNSF's LYB train would have been on

the 50/50 Line moving east towards Lacassine Yard. If BNSF's LYB train had operated according to BNSF's plan the train would have created a conflict with YAK64.

**Conflict 7.** BNSF's LYB train could not have moved over the 50/50 Line to Lacassine Yard by 1216 for a second reason: both signal and bridge employees held mainline work permits east of the Rose Bluff Industrial Lead between 1130 and 1400, and the Union Pacific mainline dispatcher restricted train movements during that period accordingly. Because of approaching westbound traffic, including Amtrak's Sunset Limited, BNSF's LYB train could not have proceeded east to Lacassine Yard until much later in the day, after the work permits expired and after the westbound traffic passed through the area.

Union Pacific is *not* suggesting BNSF direct service to LYB would create each one of these conflicts in an unstoppable chronological sequence. Indeed, if BNSF had tried to implement its operating plan on February 21, BNSF's LYB train could not even have entered Rose Bluff Yard until at least 1330. Once BNSF finished serving LYB, its train likely would have been trapped on the Montell Lead overnight during KCS's operating window in Rose Bluff Yard. See Counsel's Exhibit 13. We are, however, suggesting that each of these conflicts is rooted in *actual* and *complete* data – not self-serving interpretations of incomplete field observations assembled to achieve a desired result. Further, we are suggesting this collection of conflicts shows the utter failure of BNSF's plan for direct service to LYB.

**B. BNSF's direct service to LYB would create cascading delays, impairing service to customers served using the Rose Bluff Industrial Lead and disrupting operations across Union Pacific's network.**

BNSF will inevitably respond to the mountain of evidence showing its proposed operating plan is not viable by claiming the many conflicts identified above could be avoided through minor adjustments – Union Pacific or BNSF could hold a train here, or suspend switching there, or clear

a track in some other place. BNSF will claim that with just a little more coordination, all would be well. However, BNSF cannot escape the fundamental fact that Union Pacific's and KCS's existing operations consume virtually all the operational capacity in Rose Bluff Yard, on the Rose Bluff Industrial Lead, and on the Montell Lead. In this environment, holding a train, suspending switching, or clearing a track might solve one problem, but it would create a cascade of new problems by disrupting the choreographed sequence of events Union Pacific and KCS have designed to maximize service in a capacity-constrained area.<sup>35</sup> The disruptive effects would not be confined to shippers served using the Rose Bluff Industrial Lead. When those shippers cannot move cars into or out of their facilities, traffic will back up in Rose Bluff Yard. When Rose Bluff Yard becomes congested, traffic will back up in North Yard. When North Yard becomes congested, that affects traffic across our system. This is fact, not conjecture. The Lafayette Subdivision was ground zero of the UP/SP service crisis. And, as the Board knows, Union Pacific's Southern Region has been the epicenter of our recent service challenges. BNSF's entirely unnecessary request for direct service – abandoning the efficient switching arrangement that helps keep this sensitive area from becoming overwhelmed while preserving competitive access – puts Union Pacific's network and our customers needlessly at risk.

We showed above in Section III.A.2.b.2 how BNSF's simplistic suggestions would not resolve the daily conflicts BNSF's plan would create on the Montell Lead. But Montell Lead

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<sup>35</sup> Close coordination and extensive communications among Union Pacific and KCS field personnel have so far managed to enable both railroads to share this thoroughly congested space, at the very edge of its physical capacity. That does not mean, however, that the substantial and deleterious operational consequences of dropping a third railroad into this already congested area can be avoided with more of the same – *more coordination*. There is a diminishing marginal return to most phenomena, including inter-railroad coordination and communication as physical capacity constraints in rail facilities are stretched to their very limits. The gains from any inter-railroad coordination “stretch” to physical capacity in West Lake Charles were fully realized long ago.

operations are only a small part of the problem. In most cases, the LYB train would not even reach the Montell Lead in the timeframes proposed by BNSF – the conflicts and consequences would begin much earlier.

The conflicts and consequences would begin each morning when BNSF plans to depart Lacassine Yard for Rose Bluff Yard. Union Pacific is scheduled to begin working in Rose Bluff Yard immediately after KCS leaves Rose Bluff Yard. As discussed above, YRB65 starts switching cars at the west end of the Yard soon after Union Pacific's switching window begins, or, when KCS overstays its window, as soon as KCS finishes working in the west end of the Yard. If YRB65 is working in the west end of the Yard, BNSF cannot move through the Yard. Even if BNSF could move over the 50/50 Line and enter the Yard, its exit to the Rose Bluff Industrial Lead would be blocked by YRB65. Indeed, depending on when BNSF could find a window to move over the 50/50 Line to Rose Bluff Yard, its exit also might be blocked by YRB86, which would be picking up cars on the Lead on its way to the Yard. To avoid creating a conflict with existing operations and have a clear route to Rose Bluff Yard, BNSF would have to wait at Lacassine Yard until YRB86 finished its work in Rose Bluff Yard and moved over the 50/50 Line to North Yard. BNSF would also have to wait until YRB65 finished its work in Rose Bluff Yard and finished dropping off cars along the Rose Bluff Industrial Lead between the Yard and the Montell Lead. BNSF would likely arrive at LYB and complete its service to LYB so late in the day that its return through the Yard would be blocked by YAK63, or would occur during KCS's window in the Yard.

BNSF might say Union Pacific should not allow YRB65 to begin working until BNSF moves through Rose Bluff Yard. However, the delay to YRB65 would be substantial, especially if KCS overstays its window, because YRB65 then could not begin its work even after KCS finishes working in the west end of the Yard. And, if KCS overstays its window, YRB86 is even more

likely to be blocking the exit from the Yard to the Rose Bluff Industrial Lead by the time BNSF would arrive at the Yard. (Indeed, BNSF could not even enter the Montell Lead until after YRB86 has moved up the Rose Bluff Industrial Lead and pulled any cars staged on the Montell Lead.) Even if KCS does not overstay its window, YRB65 could not start working until BNSF moves from Lacassine Yard through Rose Bluff Yard. The delay to YRB65 could be considerable in that case because BNSF has no guaranteed clear route over the 50/50 Line to Rose Bluff Yard. (And BNSF would still have to contend with either the presence of cars on the Montell Lead or the presence of YRB86 on the Rose Bluff Industrial Lead.)

BNSF might say YRB65 could begin work as soon as possible but clear a route for BNSF. However, YRB65 would then have to clear a route, suspend switching, and resume switching twice: once for BNSF, and once to clear a route for YRB86. Moreover, by the time YRB65 clears a route for BNSF, YRB86 is likely to be blocking the exit from the Yard to the Rose Bluff Industrial Lead. BNSF might say YRB65 should clear a route through the Yard for BNSF, and YRB86 should remove any cars from the Montell Lead, then hold on the Rose Bluff Industrial Lead south of the Montell Lead, to give BNSF a clear route to the Montell Lead. But that would substantially disrupt the operations of both YRB65 and YRB86. And until YRB65 and YRB86 cannot finish their work and leave Rose Bluff Yard, Union Pacific cannot move YAK63 from North Yard to Rose Bluff Yard, which means that inbound traffic sits in North Yard, or YAK63/YRB74 lacks sufficient time in Rose Bluff Yard to complete its switching assignments, which leaves more work the next day for YRB65, feeding the cycle of congestion and service deterioration.

The consequences of disrupting the operations in Rose Bluff Yard and on the Rose Bluff Industrial Lead will spread beyond the Yard and the Lead. If YRB65 cannot complete its switching

assignment in the Yard, cars will not reach shippers on the Lead, which has an immediate impact on those shippers. Even more concerning for Union Pacific, those cars will back up in the Yard. The presence of more cars in the Yard will make it more difficult for KCS and Union Pacific trains to perform their work in the Yard, which will add to the congestion. More cars in Rose Bluff Yard also means Union Pacific must hold more cars in North Yard, which will become even more congested as it continues to receive inbound traffic for shippers on the Rose Bluff Industrial Lead that cannot be moved to Rose Bluff Yard by YAK63, or that is moved to Rose Bluff Yard but adds to the feedback cycle that will eventually impact North Yard. If operations in North Yard become compromised, the impacts will be felt across Union Pacific's Southern Region.

Similarly, if YRB86 is substantially delayed, car will miss their cut-off in North Yard, adding to the congestion in the Yard, as new cars continue to arrive (and have nowhere to go because of congestion in Rose Bluff Yard). YRB86 also may not complete its assignments in Rose Bluff Yard, which means cars KCS leaves in the Yard for Union Pacific will remain in the Yard, contributing to the congestion, and adding to the pressure on North Yard and spreading delay and disruption to traffic flows across Union Pacific's Southern Region.

BNSF's failure to confront the issues its proposed operating plan would create is driven home by its entirely erroneous assertion that its plan "would free up capacity and reduce congestion in UP's Lake Charles Yard and in the Rosebluff Yard." (Petition at 10.) BNSF's plan would not eliminate any train operating today in the Lake Charles area. An LYB train would not replace a Union Pacific train. Union Pacific would still have to operate all the same trains it currently operates in Rose Bluff Yard, on the Rose Bluff Industrial Lead, on the Montell Lead, and on the 50/50 Line to handle Union Pacific and KCS cars to LYB and other Zone 2 customers. And BNSF would continue to deliver and pick up cars at North Yard that Union Pacific would handle for

BNSF's other customers on the Rose Bluff Industrial Lead and the Montell Lead. BNSF's LYB train would be an additional train that would operate over the 50/50 Line, through Rose Bluff Yard, and over the Rose Bluff Industrial Lead and the Montell Lead. Any marginal impact from removing BNSF's cars for LYB from Union Pacific's trains would be outweighed by BNSF's consumption of an additional slot on the 50/50 Line and the delays and disruption to Union Pacific's operations in Rose Bluff Yard, on the Rose Bluff Industrial Lead, and on the Montell Lead.

BNSF similarly fails to confront the issues presented by its proposed operation plan when it claims its operations over the Rose Bluff Industrial Lead would be similar to its operations over Union Pacific's Baytown Subdivision and Sabine Lead. (Reilly VS at 12-13.) The Baytown Subdivision and Sabine Lead are very different from the Rose Bluff Industrial Lead. The Baytown Subdivision is not a dead-end switching lead like the Rose Bluff Industrial Lead: Union Pacific lines connect to the northern and southern ends of the Subdivision. Thus, there is no equivalent to the small, heavily-used Rose Bluff Yard. Union Pacific and BNSF do not even enter the Subdivision from the same location. Union Pacific enters from the south end and treats the Subdivision as a through route; BNSF enters from the north. Both railroads have yards to support operations on the Subdivision: Union Pacific has yards at three locations on the Subdivision; BNSF has its own large yard at the north end and an agreement with a third party to store cars and originate crews further down the line. The Sabine Lead also lacks the sort of choke point created by Rose Bluff Yard. It has lower carload volume and fewer switching requirements, as well as more capacity to handle existing traffic, than the Rose Bluff Industrial Lead. Union Pacific has three yards to support its operations on the Sabine Lead, and BNSF supports its operations from its yard in Beaumont, located at the north end of the Sabine Lead. And, of course, the Baytown

Subdivision and Sabine Lead are accommodating operations of *two* railroads, not the *three* railroads that BNSF would have operating through Rose Bluff Yard.

\* \* \*

Even under the best of circumstances, Union Pacific and KCS face significant challenges in completing their scheduled operations in Rose Bluff Yard and on the Rose Bluff Industrial Lead. That is why both railroads frequently overstay their windows in the Yard. Union Pacific and KCS have been able to address the severe capacity constraints in the Yard and on the Lead only through close coordination and extensive communication. However, coordination and communication can only go so far. At some point, more capacity is required to accommodate additional service. BNSF's own evidence shows we are well past that point with regard to the Yard and the Lead.

#### **IV. BNSF SHOULD BE REQUIRED TO SWAP RESPONSIBILITY FOR DIRECT SERVICE WITH UNION PACIFIC.**

Union Pacific believes the Board would cause serious harm to shippers in the Lake Charles area and shippers across the rail network if it authorizes BNSF direct service to LYB. We do not believe Rose Bluff Yard, the Rose Bluff Industrial Lead, and the Montell Lead can accommodate the operations of three carriers directly serving customers. After careful consideration of the risks to its network operations and its customers, Union Pacific has determined it will accept a sweeping solution: the Board should condition BNSF's use of the Rose Bluff Industrial Lead on BNSF's agreement to swap responsibility with Union Pacific for Rose Bluff Yard, the Rose Bluff Industrial Lead, and the Montell Lead. In other words, BNSF would assume responsibility for directly serving shipper facilities in Zone 2, including switching cars for KCS and Union Pacific. BNSF would also assume responsibility for switching Union Pacific traffic moving to shippers in Zone 1. To facilitate this transfer of responsibility, Union Pacific would give BNSF our 12-hour operating window in Rose Bluff Yard. BNSF would pick up Union Pacific cars for shippers in

Zones 1 and 2 in North Yard, and drop off Union Pacific cars from shippers in Zones 1 and 2 in North Yard. Union Pacific would pay BNSF the same fee for these services that BNSF presently pays Union Pacific (subject to the same fee escalation provisions).<sup>36</sup>

To be clear, under this proposed swap arrangement, BNSF would be fully free to operate a special BNSF direct train to LYB. BNSF would have full authority to adjust its other operations to accommodate the new service to LYB. BNSF would decide when to hold trains, suspend switching, or clear a track to accommodate the new service, and it would decide which train to hold, which switching to suspect, and which tracks to clear. If operating issues arise, they will reflect decisions made solely by BNSF. BNSF will not be able to point fingers at Union Pacific.

Union Pacific does not offer this proposal lightly. We believe we have the knowledge and experience needed to continue providing a high level of customer service in this extremely challenging operating environment. However, that same knowledge and experience lead us to conclude that attempting to accommodate direct service by three railroads in this capacity-constrained area would produce the worst possible outcome for shippers in the Lake Charles area and across our network. We understand the Board and BNSF may disagree with our assessment. But we are not willing to sacrifice service to our customers to prove a point.

**V. BNSF SHOULD PAY ALL ADDITIONAL COSTS ASSOCIATED WITH ITS OPERATIONS OVER THE ROSE BLUFF INDUSTRIAL LEAD.**

BNSF contends in its Petition, as it has throughout this proceeding, that it should not be required to pay any compensation for using the terminal trackage rights granted in Decision No. 3,

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<sup>36</sup> BNSF would also step into Union Pacific's shoes in terms of our obligations to KCS, although BNSF would be free to renegotiate those obligations, so long as Union Pacific retains the access to shippers BNSF enjoys today.

other than the trackage rights fee BNSF agreed to pay in the UP/SP merger. (Petition at 15.) BNSF's position is a blatant overreach and should be rejected.

Under 49 U.S.C. § 11102(a) and (b), a rail carrier granted use of terminal facilities must compensate the facilities' owner. BNSF knows this. When the Board granted BNSF terminal trackage rights over the Shreveport and Beaumont segments in the UP/SP merger proceeding, the agency required BNSF to compensate KCS. *See Union Pac. Corp. – Control & Merger – S. Pac. Rail Corp.*, 1 S.T.B. 233, 449 (1996) (“Section [11102(a)] provides that the carriers are responsible for establishing the conditions and compensation applicable to terminal trackage rights awarded under [Section 11102], and we will therefore allow BNSF and KCS an opportunity to reach an agreement respecting such matters.”). BNSF and KCS subsequently entered into a trackage rights agreement under which BNSF agreed to compensate KCS.<sup>37</sup>

The outcome should be the same here. As in the case of the Shreveport and Beaumont segments, BNSF would voluntarily accept the benefits and obligations associated with a grant of terminal trackage rights, including the obligation to compensate KCS. The case for requiring BNSF to compensate KCS would be even stronger here. BNSF already has access to LYB through reciprocal switching, and it has no need to use trackage rights to serve those shippers. Indeed, BNSF has been an extremely effective competitor using reciprocal switching: {{  
}} BNSF's decision to use terminal trackage rights instead of the current reciprocal switching arrangement is entirely voluntary, and BNSF alone should bear the costs of its unilateral decision.

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<sup>37</sup> See Counsel's Exhibit 15 (Shreveport/Beaumont Trackage Rights Agreement).

## VI. CONCLUSION

BNSF's proposed operating plan is not viable. However, neither BNSF nor Union Pacific has the incentive to invest in the capacity required to accommodate direct service by a third railroad in Rose Bluff Yard, on the Rose Bluff Industrial Lead, or on the Montell Lead. Under the circumstances, Union Pacific's proposal to swap responsibility with BNSF for these facilities is the only way to protect customers and rail operations from the grievous harms that would be caused by a Board order forcing BNSF direct service to LYB on top of the existing two-carrier operations in this sensitive, capacity-constrained portion of our network.

Respectfully submitted,

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June 25, 2018

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of June, 2018, I caused a copy of the foregoing document to be served by email or first-class mail, postage prepaid, on all parties of record in Finance Docket No. 32760 (Sub-No. 46).

/s/ Michael L. Rosenthal

## **VERIFICATION**

I, David Berry, Assistant Manager Resource Planning in Network Planning and Operations for Union Pacific Railroad Company, declare under penalty of perjury that I have reviewed the description of railroad operations in the Lake Charles area and service to LyondellBasell in Sections II.A.1 through 5 of the foregoing document and that the factual information presented therein is true and correct. Further, I certify that I am qualified and authorized to file this statement.

Executed on June 25, 2018.

/s/ David Berry

### **VERIFICATION**

I, Chris Sanford, Manager Commercial and Interline Strategy for Union Pacific Railroad Company, declare under penalty of perjury that I have reviewed the description of traffic volume in Section II.A.6 of the foregoing document and that the factual information presented therein is true and correct. Further, I certify that I am qualified and authorized to file this statement.

Executed on June 25, 2018.

/s/ Chris Sanford

## **VERIFICATION**

I, David W. Hughes, Senior Director Joint Facilities for Union Pacific Railroad Company, declare under penalty of perjury that I have reviewed the description of communications among BNSF Railway, Kansas City Southern Railway, and Union Pacific Railroad Company regarding BNSF's request to serve LyondellBasell in Section II.B of the foregoing document and that the factual information presented therein is true and correct. Further, I certify that I am qualified and authorized to file this statement.

Executed on June 25, 2018.

/s/ David W. Hughes

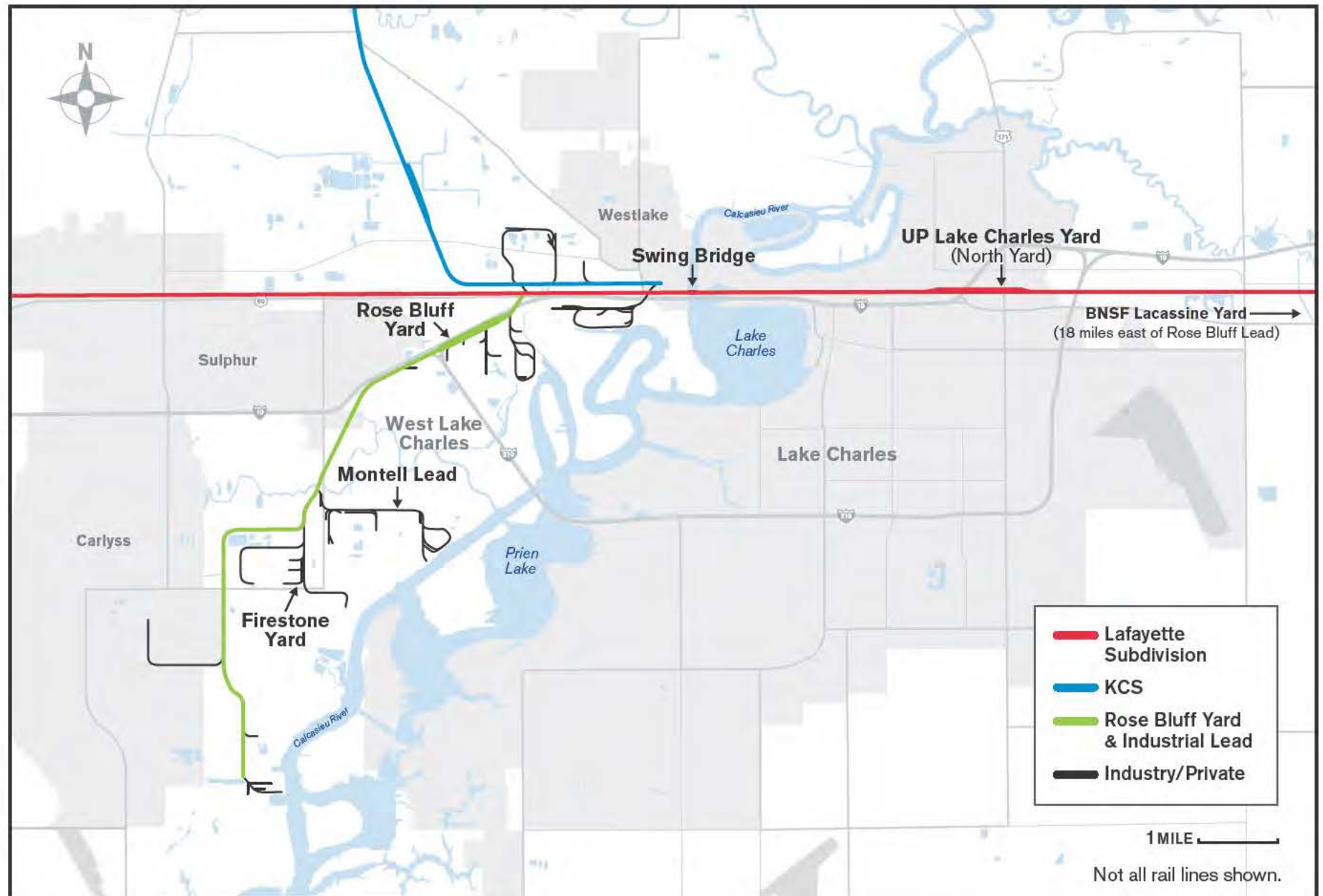
## **VERIFICATION**

I, Peggy Harris, Director Asset Planning in Network Planning and Operations for Union Pacific Railroad Company, declare under penalty of perjury that I have reviewed the discussion of BNSF Railway Company's proposed operating plan, including BNSF's field study, BNSF's illustrative animation, BNSF's evidence based on 2014 operating data, Union Pacific's study of operations in the Lake Charles area, and the consequences of BNSF direct service to LyondellBasell, in Sections III.A and III.B of the foregoing document and that the factual information presented therein is true and correct. Further, I certify that I am qualified and authorized to file this statement.

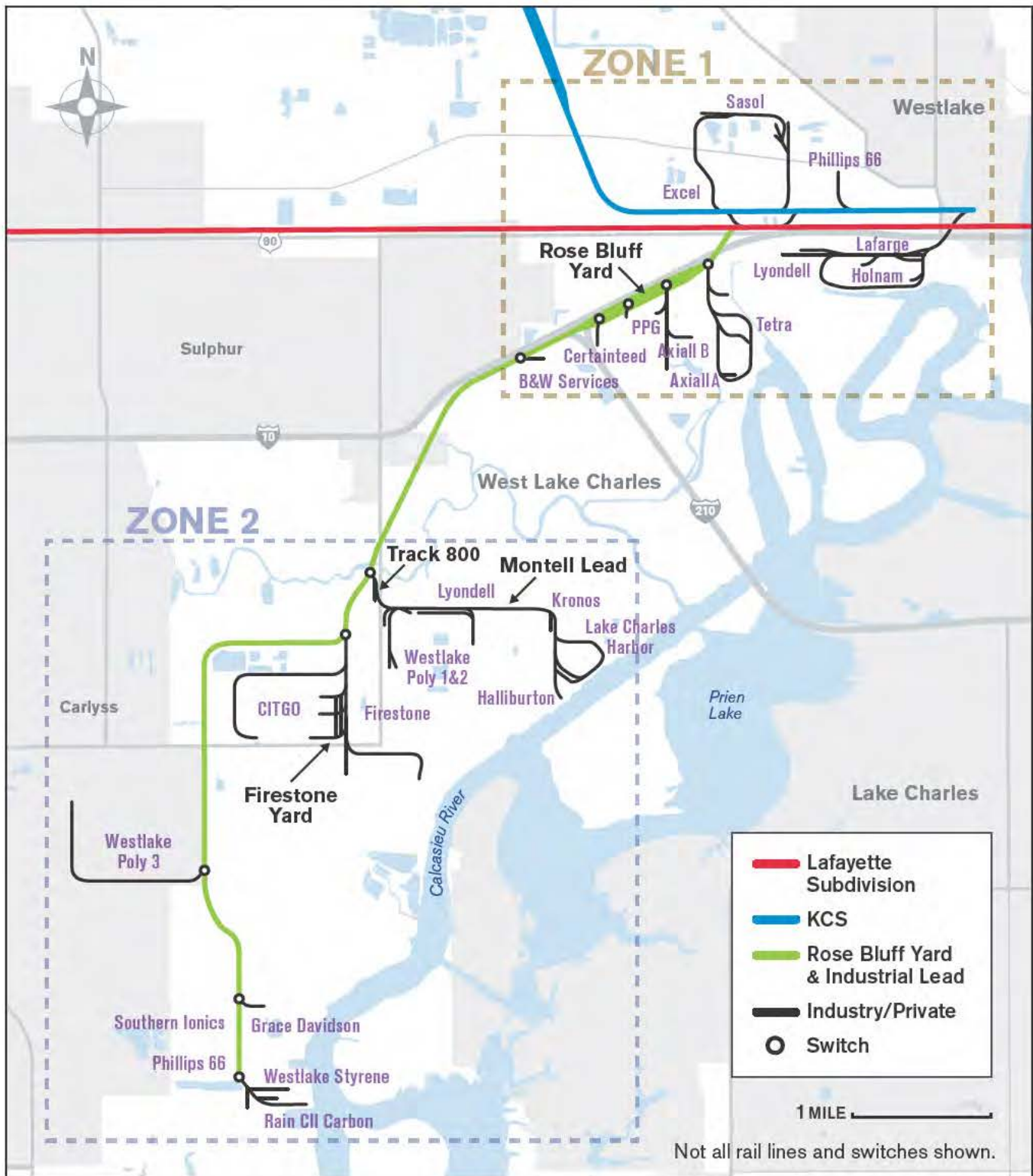
Executed on June 25, 2018.

/s/ Peggy Harris

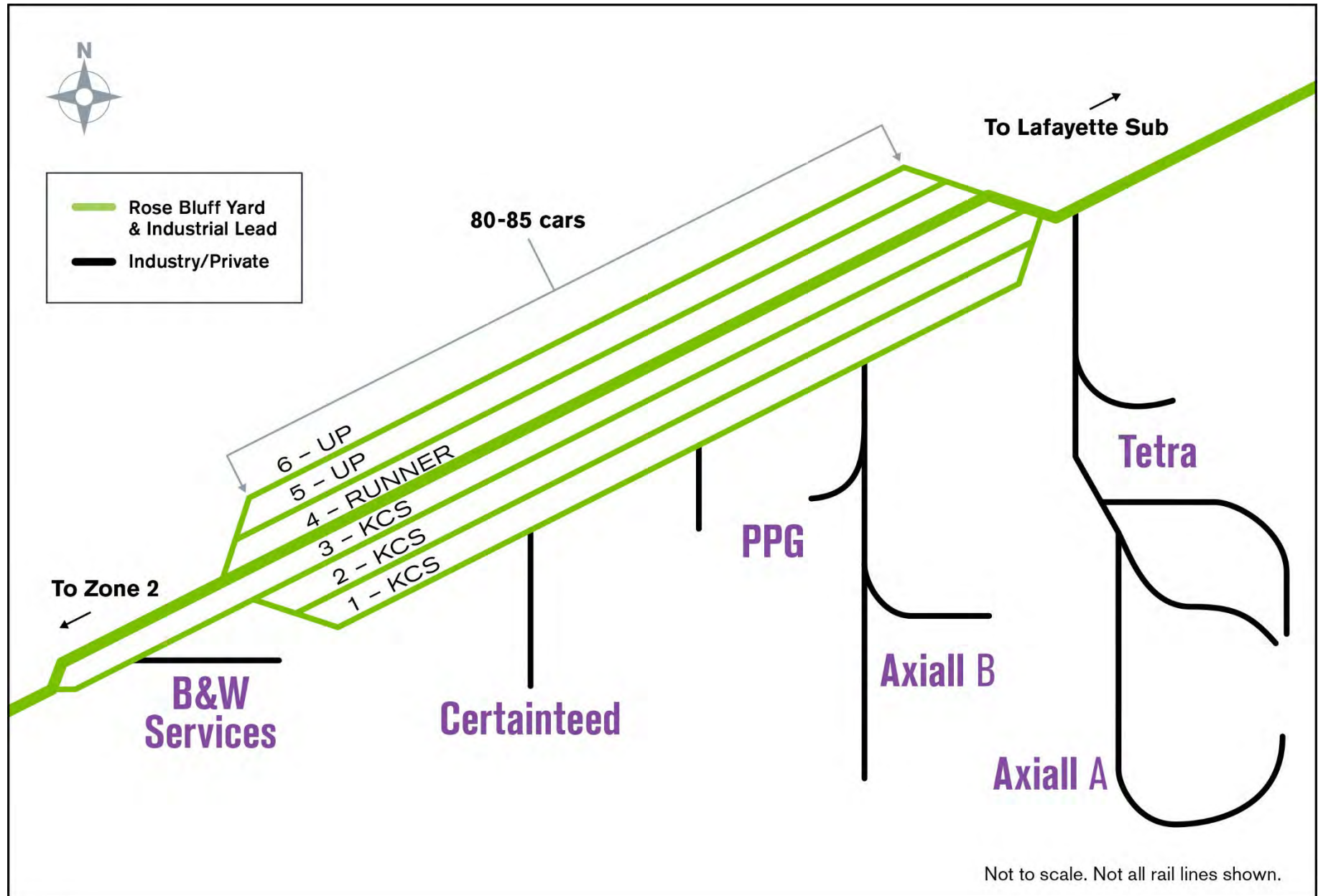
# Overview of Lake Charles Area Trackage



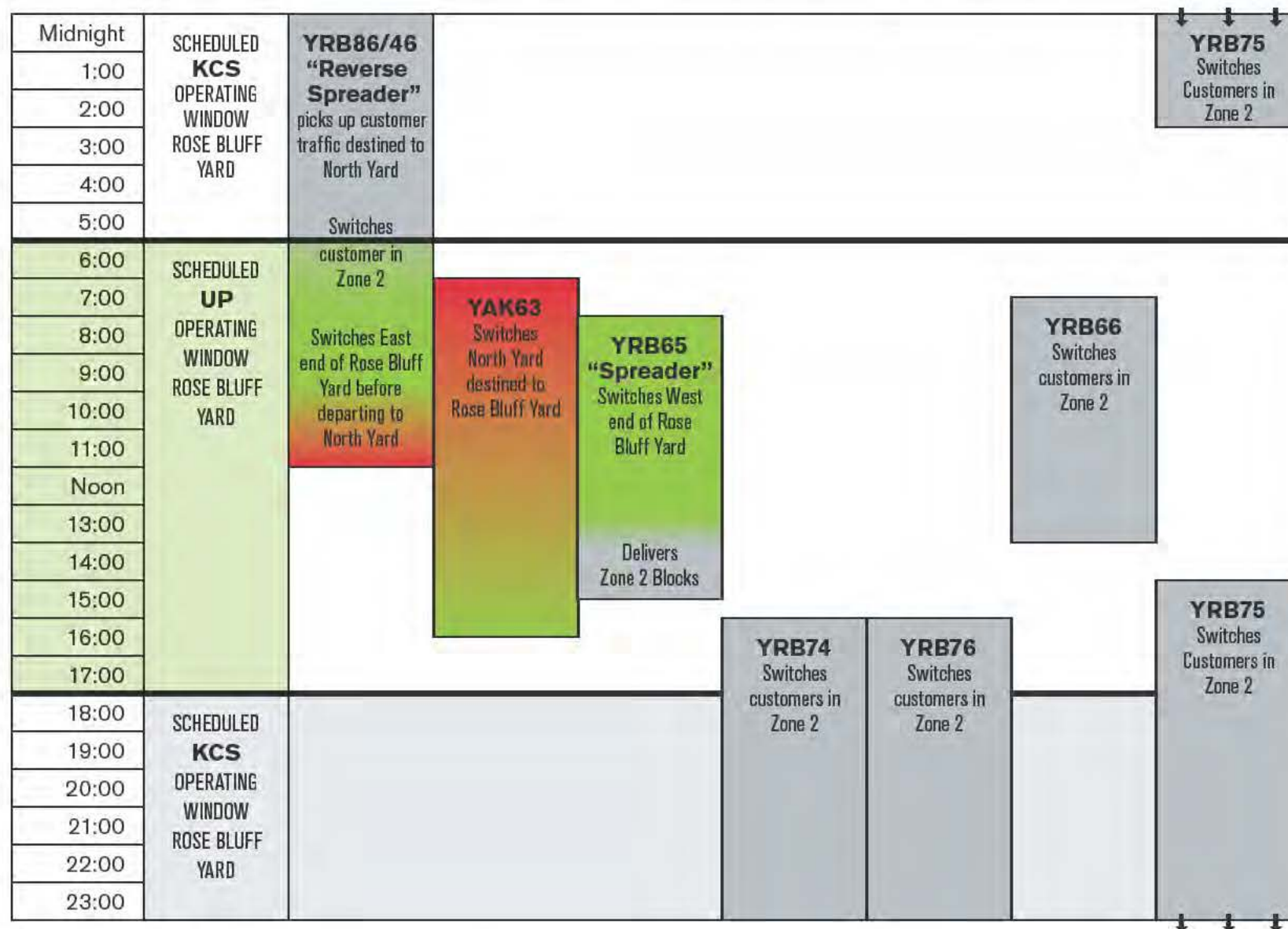
# Rose Bluff Yard and Industrial Lead



# Rose Bluff Yard



# Union Pacific Train Schedules for the Rose Bluff Industrial Lead

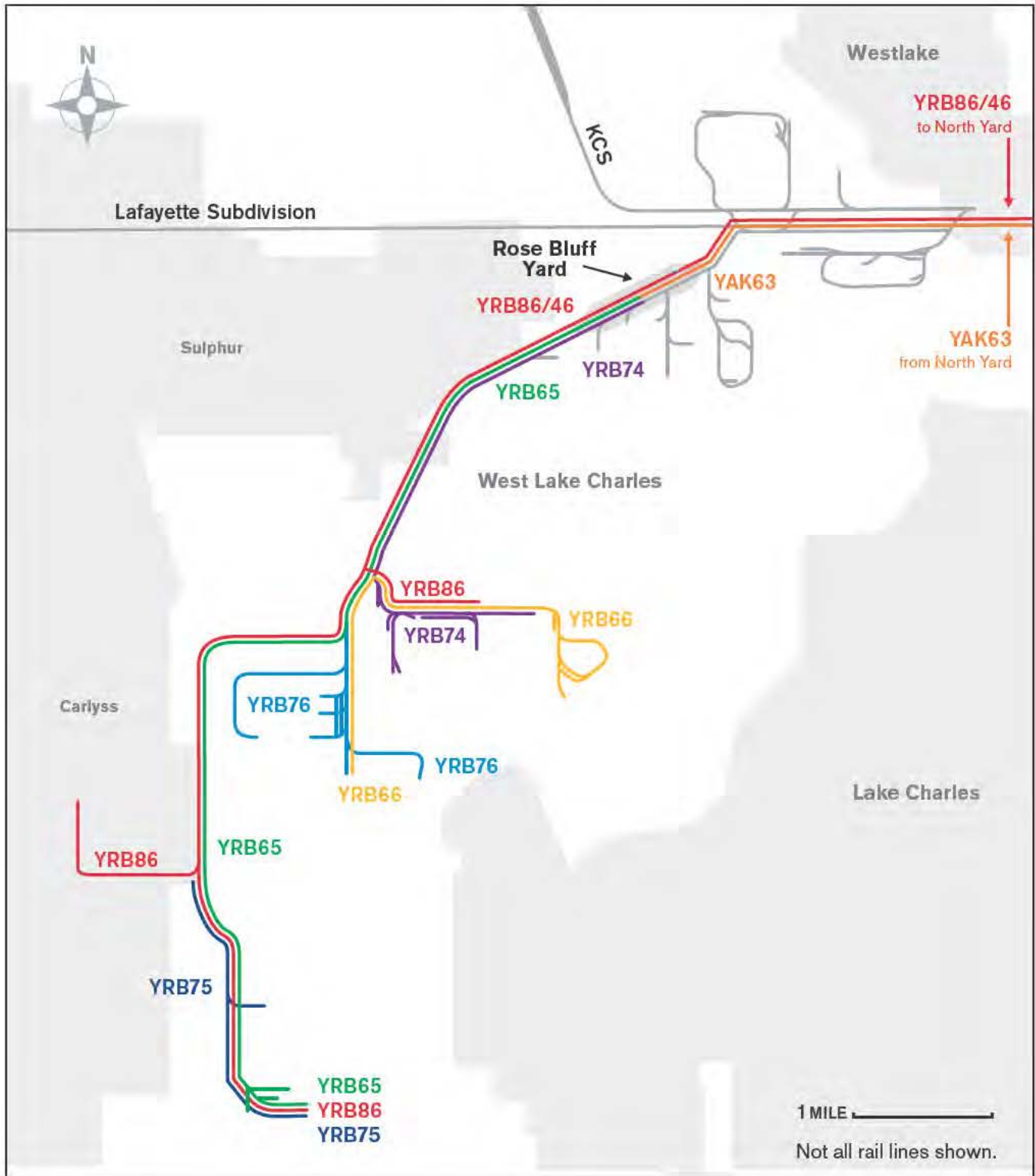


## LOCATION OF UP TRAINS

Rose Bluff Yard
  Industrial Lead
  In or enroute to/from North Yard

Chart indicates scheduled start and end times. Actual times vary.

# Union Pacific Train Operations on the Rose Bluff Industrial Lead



**CONTAINS CONFIDENTIAL OR  
HIGHLY CONFIDENTIAL MATERIAL**

**REDACTED FROM PUBLIC FILING**

**CONTAINS CONFIDENTIAL OR  
HIGHLY CONFIDENTIAL MATERIAL**

**REDACTED FROM PUBLIC FILING**

**CONTAINS CONFIDENTIAL OR  
HIGHLY CONFIDENTIAL MATERIAL**

**REDACTED FROM PUBLIC FILING**

**CONTAINS CONFIDENTIAL OR  
HIGHLY CONFIDENTIAL MATERIAL**

**REDACTED FROM PUBLIC FILING**

**CONTAINS CONFIDENTIAL OR  
HIGHLY CONFIDENTIAL MATERIAL**

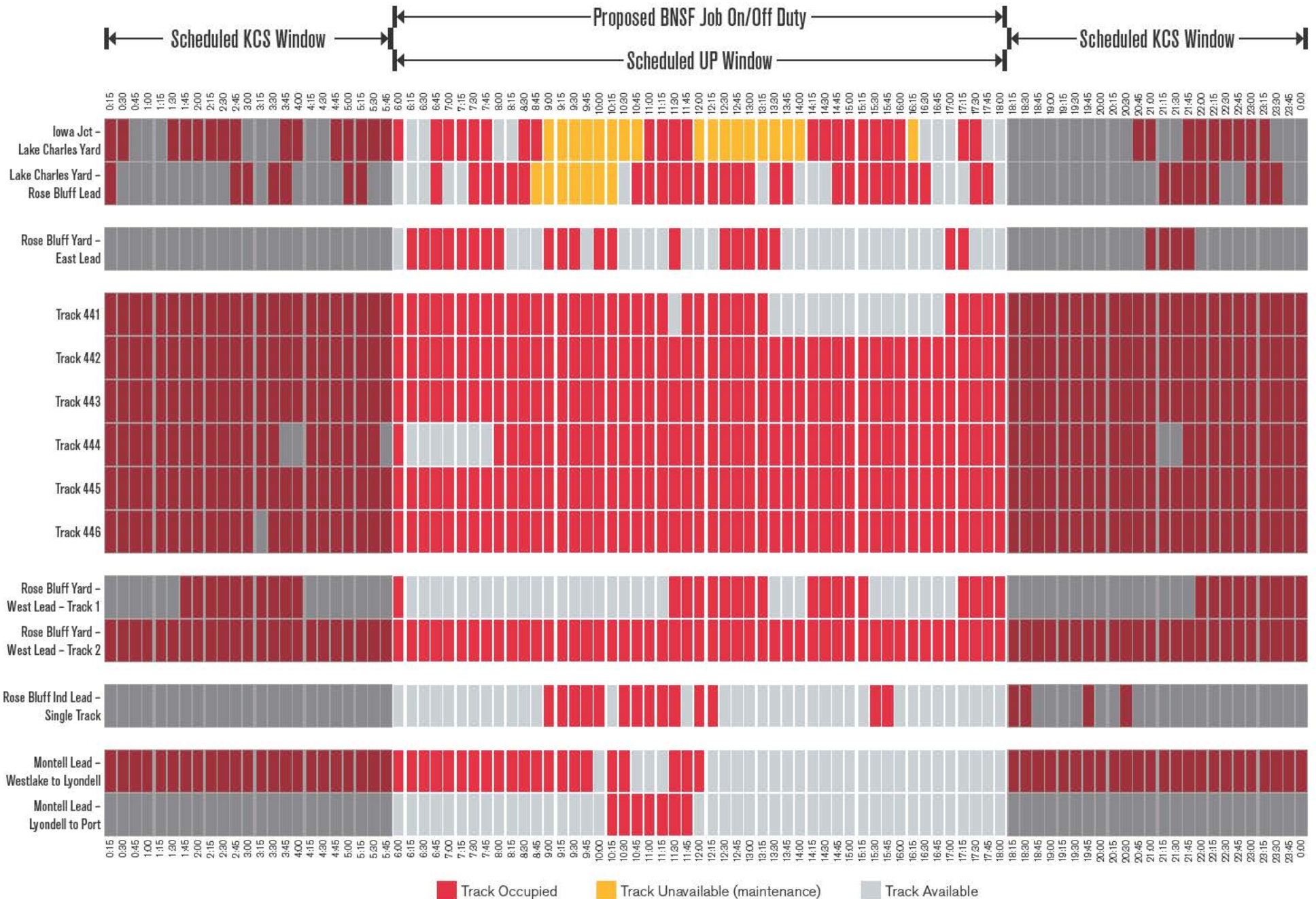
**REDACTED FROM PUBLIC FILING**

**UNION PACIFIC**  
**ANIMATION OF OPERATIONS**  
**OCTOBER 3, 2017, AND FEBRUARY 21, 2018**  
**PRODUCED ELECTRONICALLY**

**CONTAINS CONFIDENTIAL OR  
HIGHLY CONFIDENTIAL MATERIAL**

**REDACTED FROM PUBLIC FILING**

# Union Pacific February 21, 2018 Lake Charles Study Results



## Union Pacific February 21, 2018 Rose Bluff Yard Video Excerpts

North camera:

Focused on the Rose Bluff yard office; not unusual at this time of day.

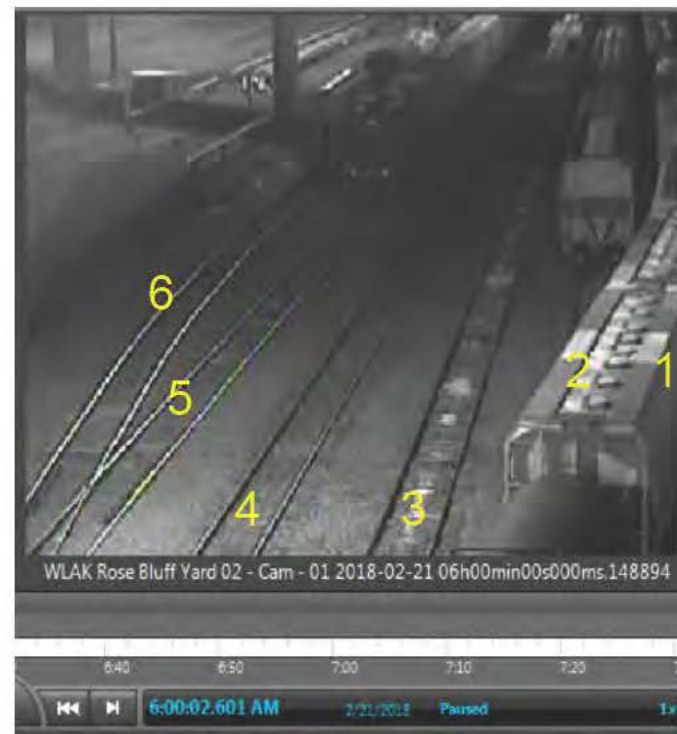
Track 4 blocked by KCS locomotive (headlight can be seen)



North Camera  
02/21/18 – 6:00

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



South Camera  
02/21/18 – 6:00



North camera:

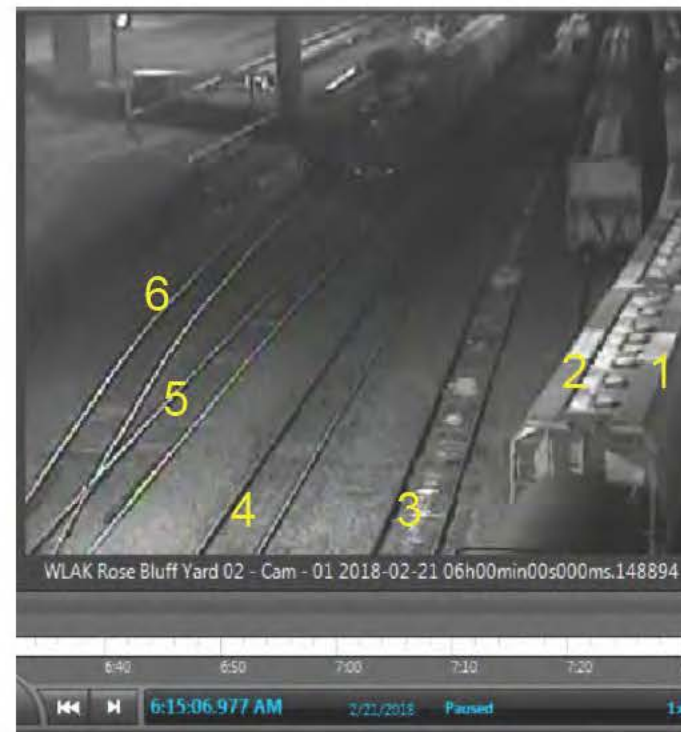
KCS is actively switching and blocking lead into Track 4

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



North Camera  
02/21/18 – 6:15



South Camera  
02/21/18 – 6:15

North camera:

KCS is actively switching and blocking lead into Track 4

South camera:

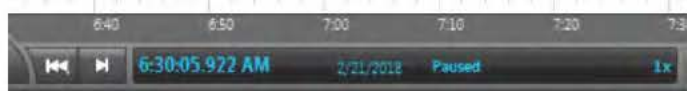
Tracks 1, 2, 3, 5, and 6 blocked by cars



North Camera  
02/21/18 – 6:30



South Camera  
02/21/18 – 6:30



North camera:

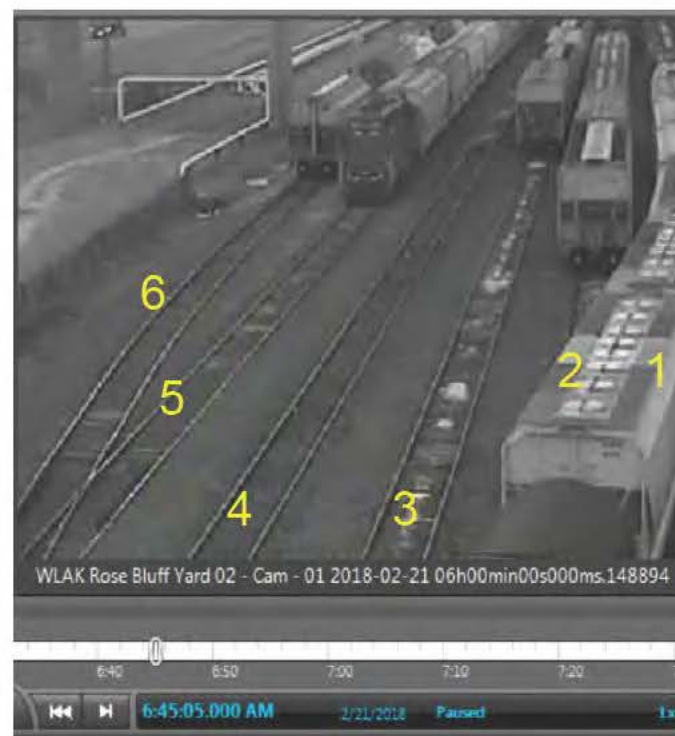
KCS is actively switching and blocking lead into Track 4

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



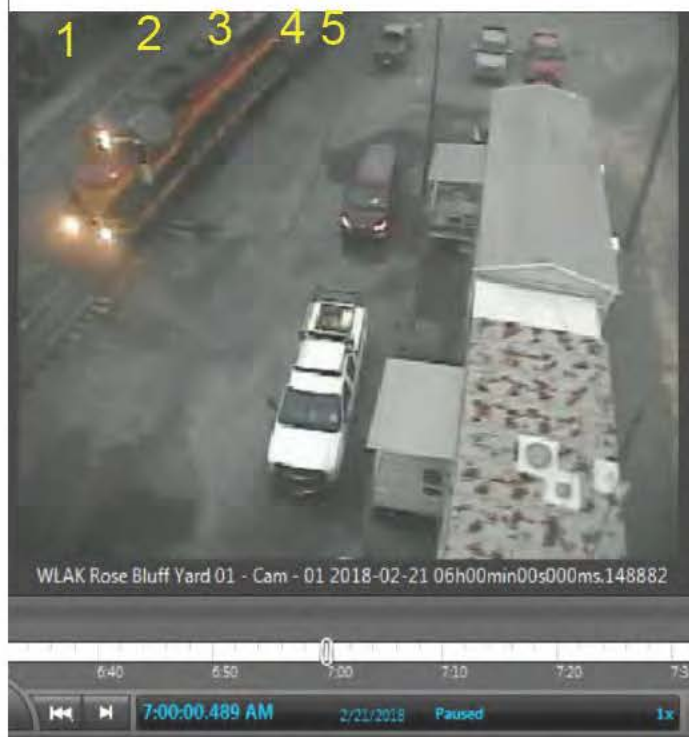
North Camera  
02/21/18 - 6:45



South Camera  
02/21/18 - 6:45

North camera:

KCS is actively switching into Track 5 and blocking access to Track 4



North Camera  
02/21/18 – 7:00

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



South Camera  
02/21/18 – 7:00

North camera:

KCS is actively switching east end of yard, blocking lead into Track 4 and other tracks

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



North Camera  
02/21/18 - 7:15



South Camera  
02/21/18 - 7:15

North camera:

KCS is actively switching at east end of yard, blocking lead into Track 4 and other tracks

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



North Camera  
02/21/18 – 7:30



South Camera  
02/21/18 – 7:30

North camera:

KCS is actively switching east end of yard, blocking lead into Track 4 and other tracks

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



North Camera  
02/21/18 – 7:45



South Camera  
02/21/18 – 7:45

North camera:

KCS is actively switching east end of yard

Video shows KCS moved cars into Track 4 at 7:53, blocking  
Track 4



North Camera  
02/21/18 – 8:00

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



South Camera  
02/21/18 – 8:00



North camera:

KCS is actively switching east end of yard

Video shows KCS moved cars into Track 4 at 7:53, blocking  
Track 4



North Camera  
02/21/18 – 8:15

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



South Camera  
02/21/18 – 8:15



North camera:

KCS is actively switching east end of yard

Video shows KCS moved cars into Track 4 at 7:53, blocking  
Track 4

South camera:

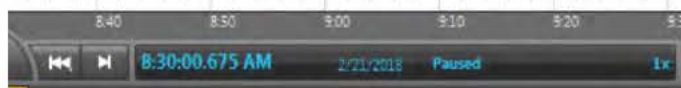
Tracks 1, 2, 3, 5, and 6 blocked by cars



North Camera  
02/21/18 – 8:30



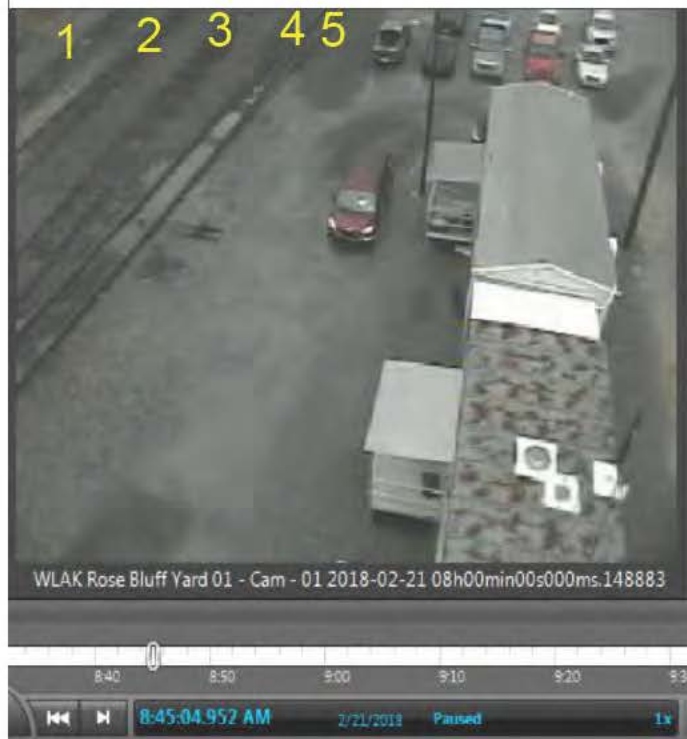
South Camera  
02/21/18 – 8:30



North camera:

KCS is actively switching east end of yard

Video shows KCS moved cars into Track 4 at 7:53, blocking  
Track 4



North Camera  
02/21/18 – 8:45

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



South Camera  
02/21/18 – 8:45



North camera:

KCS is actively switching east end of yard

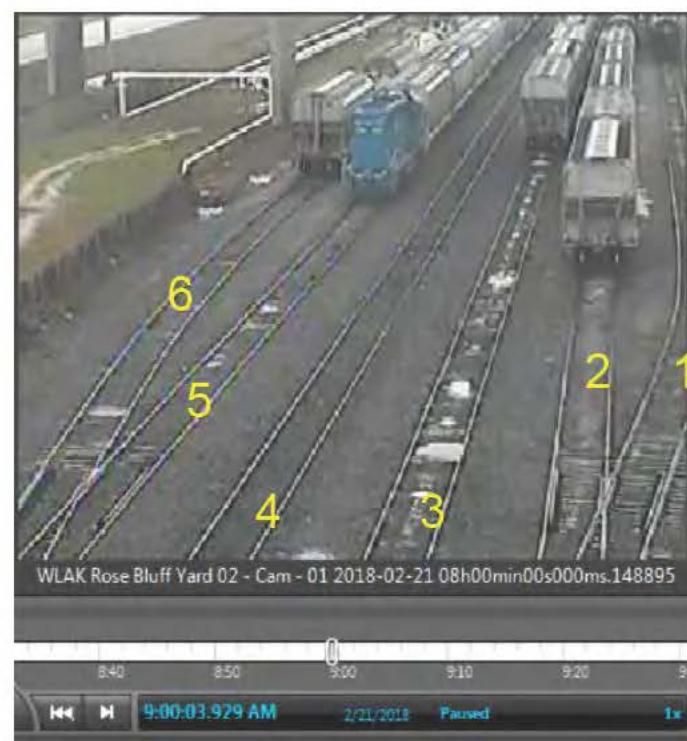
Video shows KCS moved cars into Track 4 at 7:53, blocking  
Track 4



North Camera  
02/21/18 – 9:00

South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



South Camera  
02/21/18 – 9:00



North camera:

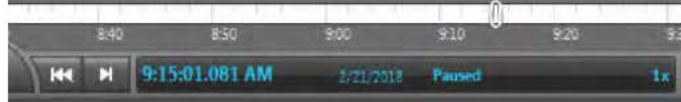
Camera realigned to focus on tracks

Tracks 2, 3, and 4 blocked

KCS switching on Track 6 and blocking Track 5



North Camera  
02/21/18 – 9:15

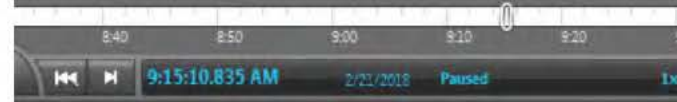


South camera:

Tracks 1, 2, 3, 5, and 6 blocked by cars



South Camera  
02/21/18 – 9:15



North camera:

Tracks 2, 3, 4, 5, and 6 blocked

KCS switching on Track 1 to serve PPG

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 9:30



South Camera  
02/21/18 – 9:30

North camera:

Tracks 2, 3, 4, 5, and 6 blocked

KCS switching on Track 1 to serve PPG

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 9:45



South Camera  
02/21/18 – 9:45

North camera:

Tracks 1, 2, 3, 4, 5, and 6 blocked

KCS switching east end of yard, blocking access to all Tracks  
Cars from PPG left on Track 1

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 10:00



South Camera  
02/21/18 – 10:00

North camera:

Tracks 1, 2, 3, 4, 5, and 6 blocked

KCS switching east end of yard, blocking access to all Tracks

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 10:15



South Camera  
02/21/18 – 10:15



North camera:

Tracks 2, 3, 4, 5, and 6 blocked

South camera:

Tracks 1, 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 10:30



South Camera  
02/21/18 – 10:30



North camera:

Tracks 1, 2, 3, 4, and 6 blocked

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 10:45



South Camera  
02/21/18 – 10:45

North camera:

Tracks 1, 2, 3, 4, and 6 blocked

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 - 11:00



South Camera  
02/21/18 - 11:00

North camera:

Tracks 1, 2, 3, 4, and 6 blocked

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 11:15



South Camera  
02/21/18 – 11:15



North camera:

KCS departed yard, video shows last car cleared Track 1 at 11:25

Tracks 2, 3, 4 and 6 blocked

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 11:30



South Camera  
02/21/18 – 11:30

North camera:

UP job YRB86 moving through yard, blocking Track 1, video shows began moving into yard at 11:33

Tracks 1, 2, 3, 4 and 6 blocked

South camera:

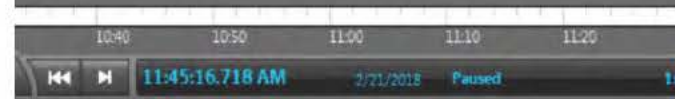
Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 11:45



South Camera  
02/21/18 – 11:45



North camera:

UP job YRB86 in yard

Tracks 1, 2, 3, 4 and 6 blocked

South camera:

UP job YRB65 begins switching at west end of yard

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 12:00



South Camera  
02/21/18 – 12:00



North camera:

Tracks 1, 2, 3, 4 and 6 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 12:15



South Camera  
02/21/18 – 12:15



North camera:

Tracks 1, 2, 3, 4 and 6 blocked

South camera:

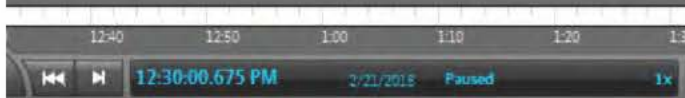
Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 12:30



South Camera  
02/21/18 – 12:30



North camera:

Tracks 1, 2, 3, 4 and 6 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 12:45



South Camera  
02/21/18 – 12:45

North camera:

Tracks 1, 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 13:00



South Camera  
02/21/18 – 13:00



North camera:

Tracks 1, 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 13:15



South Camera  
02/21/18 – 13:15

North camera:

Video shows YRB86 cleared Track 1 at 13:24

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 13:30



South Camera  
02/21/18 – 13:30

North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 13:45



South Camera  
02/21/18 – 13:45



North camera:

Tracks 2, 3, and 4 blocked

South camera:

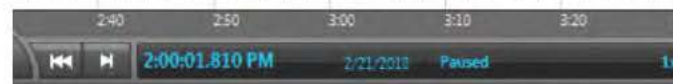
Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 14:00



South Camera  
02/21/18 – 14:00



North camera:

Tracks 2, 3, and 4 blocked

South camera:

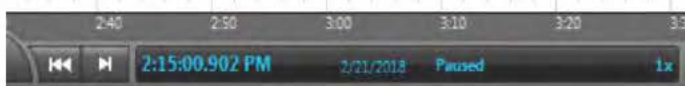
Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 14:15



South Camera  
02/21/18 – 14:15



North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 14:30



South Camera  
02/21/18 – 14:30



North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 - 14:45



South Camera  
02/21/18 - 14:45

North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 15:00



South Camera  
02/21/18 – 15:00

North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 15:15



South Camera  
02/21/18 – 15:15

North camera:

Tracks 2, 3, and 4 blocked

South camera:

UP job YRB65 leaving yard towards Rose Bluff Industrial  
Lead

Tracks 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 15:30



South Camera  
02/21/18 – 15:30

North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 15:45



South Camera  
02/21/18 – 15:45



North camera:

Tracks 2, 3, and 4 blocked

South camera:

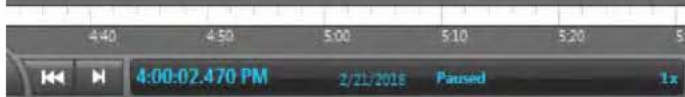
Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 16:00



South Camera  
02/21/18 – 16:00



North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 16:15



South Camera  
02/21/18 – 16:15



North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 16:30



South Camera  
02/21/18 – 16:30



North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 2, 3, 5, and 6 blocked



North Camera  
02/21/18 – 16:45



South Camera  
02/21/18 – 16:45

North camera:

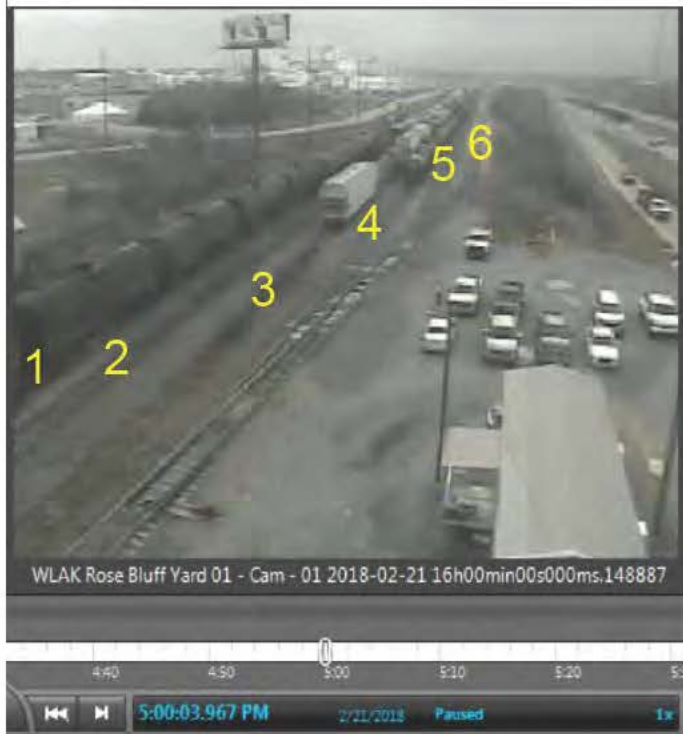
UP job YAK63 entering yard, blocking access to all Tracks,  
video shows YAK63 arrived in Track 1 at 16:49

Tracks 1, 2, 3, and 4 blocked

South camera:

Tracks 1, 2, 3, 5, and 6 blocked

UP job YRB74 (formerly designated YAK63) begins switching  
in the west end of the yard at 16:59



North Camera  
02/21/18 – 17:00



South Camera  
02/21/18 – 17:00

North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 1, 2, 3, 5, and 6 blocked



North Camera  
02/21/18 - 17:15



South Camera  
02/21/18 - 17:15

North camera:

Tracks 2, 3, and 4 blocked

South camera:

Tracks 1, 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 17:30



South Camera  
02/21/18 – 17:30

North camera:

Tracks 2, 3, and 4 blocked

South camera:

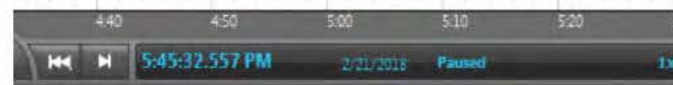
Tracks 1, 2, 3, 4, 5, and 6 blocked



North Camera  
02/21/18 – 17:45



South Camera  
02/21/18 – 17:45



North camera:

Tracks 2, 3, and 4 blocked



North Camera  
02/21/18 – 18:00

South camera:

UP job YRB74 is leaving the yard toward the Rose Bluff Industrial Lead

Tracks 1, 2, 3, 4, 5, and 6 blocked



South Camera  
02/21/18 – 18:00



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