

244910
244911
244912
244913

ENTERED
Office of Proceedings
December 28, 2017
Part of
Public Record

NOR 42144, 42150, 42152, 42153

None.

3. Plans to Address Outstanding Discovery

Arkema is collecting and reviewing records on a rolling basis to facilitate responses to Union Pacific's discovery requests.

4. Estimate of Time to Address Concerns

Arkema believes that any outstanding production will be completed by January 31, 2017, and it will update this estimate if circumstances change.

Respectfully submitted,

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

Counsel for Arkema Inc.

Date: December 28, 2017

Certificate of Service

I certify that, on December 28, 2017, I caused a copy of the foregoing document to be served by e-mail on counsel for all parties of record in this proceeding and on the Honorable John P. Dring of the Federal Energy Regulatory Commission.

/s/ Jason D. Tutrone
Jason D. Tutrone