

|                                  |   |                                |
|----------------------------------|---|--------------------------------|
| NORTH AMERICA FREIGHT CAR        | ) | Office of P                    |
| ASSOCIATION; AMERICAN FUEL &     | ) | May 1                          |
| PETROCHEMICALS MANUFACTURERS;    | ) | Pa                             |
| THE CHLORINE INSTITUTE; THE      | ) | Public                         |
| FERTILIZER INSTITUTE; AMERICAN   | ) |                                |
| CHEMISTRY COUNCIL; ETHANOL       | ) |                                |
| PRODUCTS, LLC D/B/A POET ETHANOL | ) |                                |
| PRODUCTS; POET NUTRITION, INC.;  | ) |                                |
| CARGILL INCORPORATED; and ARKEMA | ) | NOR 42144, 42150, 42152, 42153 |
| INC.                             | ) |                                |
|                                  | ) |                                |
| Complainants,                    | ) |                                |
|                                  | ) |                                |
| vs.                              | ) |                                |
|                                  | ) |                                |
| UNION PACIFIC RAILROAD COMPANY,  | ) |                                |
|                                  | ) |                                |
| Defendant.                       | ) |                                |
|                                  | ) |                                |

Arkema produced a second batch of responsive documents to UP earlier today and is processing

documents for a production next week. Arkema expects to complete production of responsive documents by June 1, 2018.

**4. Estimate of Time to Address Concerns**

There are no outstanding discovery concerns.

Respectfully submitted,

/s/ Jason D. Tutrone  
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*Counsel for Arkema Inc.*

Date: May 10, 2018

### **Certificate of Service**

I certify that, on May 10, 2018, I caused a copy of the foregoing document to be served by e-mail on counsel for all parties of record in this proceeding and on the Honorable John P. Dring of the Federal Energy Regulatory Commission.

/s/ Jason D. Tutrone  
Jason D. Tutrone