

3. Plans to Address Outstanding Discovery

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

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

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Certificate of Service

I certify that, on February 15, 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
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