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September 30, 2005

**VIA HAND DELIVERY**

Ms. Victoria Rutson  
Chief  
Section of Environmental Analysis  
Surface Transportation Board  
1925 K Street, N.W.  
Washington, D.C. 20423

**Re: Tongue River Railroad Company, Inc. - Finance Docket 31086 (Sub-No. 3) -  
Construction and Operation of the Western Alignment - Draft  
Supplemental Environmental Impact Statement**

Dear Ms. Rutson:

This letter supplements the September 20, 2005 response of the Tongue River Railroad Company, Inc. to your August 29, 2005 Information Request concerning air quality issues. Attached to this letter please find a memorandum concerning rail capacity on BNSF lines east of Miles City (toward Minnesota) and south of the Decker area (toward Gillette, WY). This information was derived from BNSF. As the information indicates, there are no current capacity problems on the lines about which you have inquired and there is room for capacity growth.

Your letter also inquires as to capacity constraints on the TRRC line. Of course, that line is not yet built, but TRRC does not envision in the reasonably foreseeable future any capacity issues on that line given the relatively small volume of projected trains/day. According to the May 1, 2003 Supplemental Verified Statement of Robert Leilich, TRRC's Operating Plan witness, the level of TRRC's operations will, based on the projected volume of coal to be transported in the first year of operation (32.1 million tons), average 6.7 round trips per day, with 6.6 of those daily trips operating over the entire Miles City/Decker route. By the sixth year of operation (when 36.9 million tons are expected to be handled), TRRC's line is projected to handle an average of 7.6 round trips/day, with 5.1 of those trips traversing the entire line. These numbers of projected round trips per day are well within the capacity of the TRRC line.

Ms. Victoria Rutson  
September 30, 2005  
Page 2

We trust that the above information responds to your questions. Please advise if you require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "David H. Coburn", with a long horizontal flourish extending to the right.

Betty Jo Christian  
David H. Coburn  
Attorneys for Tongue River Railroad Company, Inc.

cc: Mr. Ken Blodgett  
Mr. Scott Steinwert  
Ms. Mary Bean  
Mr. Douglas Day

**Subject: Line capacity for BNSF coal routes east and south of TRRC line**

Listed below is BNSF line capacity information by subdivision (accompanied by attached graphs) for the Mandan line coal route subdivisions east of Miles City, MT and for the Bighorn subdivision south of Decker, MT.

**Forsyth sub (for segment Miles City to Glendive)**

On the Forsyth sub, BNSF is currently averaging around 20 trains per day, ranging from 18 to 22 trains per day over the past six months. The limiting line capacity west of Miles City is 26 trains per day. The constraining segment is the Marsh – Shirley segment. Within this segment is the Terry, MT siding, which has a length of only 6,574 feet. At this length, coal trains greater than 116 cars cannot fit. If the Terry siding were extended, capacity east of Miles City would increase to 40+ trains per day. Extension of the Terry siding (or any other siding extensions) is not currently in BNSF's five year capital expansion plan for the sub.

**Dickinson sub west end (Glendive – Dickinson segment)**

The Dickinson sub runs from Glendive to Mandan. For capacity analysis purposes, BNSF splits this subdivision into two segments: Glendive to Dickinson, and Dickinson to Mandan. The sub is split into two segments because the west end has a higher train count due to the need for helper trains (helper locomotives are put on eastbound loaded coal trains at Glendive, go as far as the Fryburg / Dickinson area, then come back westbound as light power "K" symbols, thus the higher counts on the west end of the subdivision). On the west end of the Dickinson sub, BNSF is currently averaging around 24 trains per day, ranging from 22 to 27 trains per day over the past six months. The limiting line capacity on the west end of the sub is 36 trains per day. There are no items for the west end of the Dickinson sub in the five year capital expansion plan.

**Dickinson sub east end (Dickinson - Mandan segment)**

On the east end of the Dickinson sub, BNSF is currently averaging around 19 trains per day, ranging from 18 to 21 trains per day over the past six months. The limiting line capacity on the east end of the sub is 34 trains per day. There are no items for the east end of the Dickinson sub in the five year capital expansion plan.

**Jamestown sub (Mandan - Fargo segment)**

On the Jamestown sub, the counts are virtually identical to those on the east end of the Dickinson sub, currently averaging around 19 trains per day, ranging from 18 to 21 trains per day over the past six months. The limiting line capacity on the sub is 31 trains per day. BNSF still has room to grow the train count. The constraining segment is the Magnolia - Sanborn segment. Within this segment is the Peak, ND siding, which has a length of only 6,648 feet. Again, the longer coal

trains (such as the Detroit Edison trains) cannot fit. If the Peak siding were extended, capacity on the Jamestown sub would increase to 39 trains per day. Extension of the Peak siding (or any other siding extensions) is not currently in BNSF's five year capital expansion plan for the sub.

**Staples sub (Fargo – Minneapolis)**

On the Staples sub, BNSF is currently averaging around 43 trains per day, ranging from 40 to 45 trains per day over the past six months. The limiting line capacity on the east end of the sub is 63 trains per day. There are no items for the Staples sub in the five year capital expansion plan.

**Alternative route**

In addition to the Mandan line, an alternative route from Miles City to Minneapolis exists. That route goes through Hettinger, Mobridge, Aberdeen, Appleton, Willmar, and Wayzata on the way to Minneapolis. Listed below are volumes and capacities for the subdivisions along that route:

**Hettinger sub (Terry - Hettinger)**

On the Hettinger sub, BNSF is currently averaging around 3 trains per day, ranging from 3 to 4 trains per day over the past six months. The limiting line capacity on the sub is 12 trains per day. There are no items for the Hettinger sub in the five year capital expansion plan.

**Mobridge sub (Hettinger - Aberdeen)**

On the Mobridge sub, BNSF is currently averaging around 4 trains per day, ranging from 3 to 5 trains per day over the past six months. The limiting line capacity on the sub is 20 trains per day. There are no items for the Mobridge sub in the five year capital expansion plan.

**Appleton sub (Aberdeen - Benson)**

On the Appleton sub, BNSF is currently averaging around 4 trains per day, ranging from 3 to 5 trains per day over the past six months. The limiting line capacity on the sub is 14 trains per day. There are no items for the Appleton sub in the five year capital expansion plan.

**Morris sub (segment from Benson to Willmar only)**

On the Benson – Willmar segment of the Morris sub, BNSF is currently averaging around 8 trains per day, ranging from 7 to 10 trains per day over the past six months. The limiting line capacity on this portion of the sub is 40 trains per day. There are no items for the Morris sub in the five year capital expansion plan.

**Wayzata sub (Willmar - Minneapolis)**

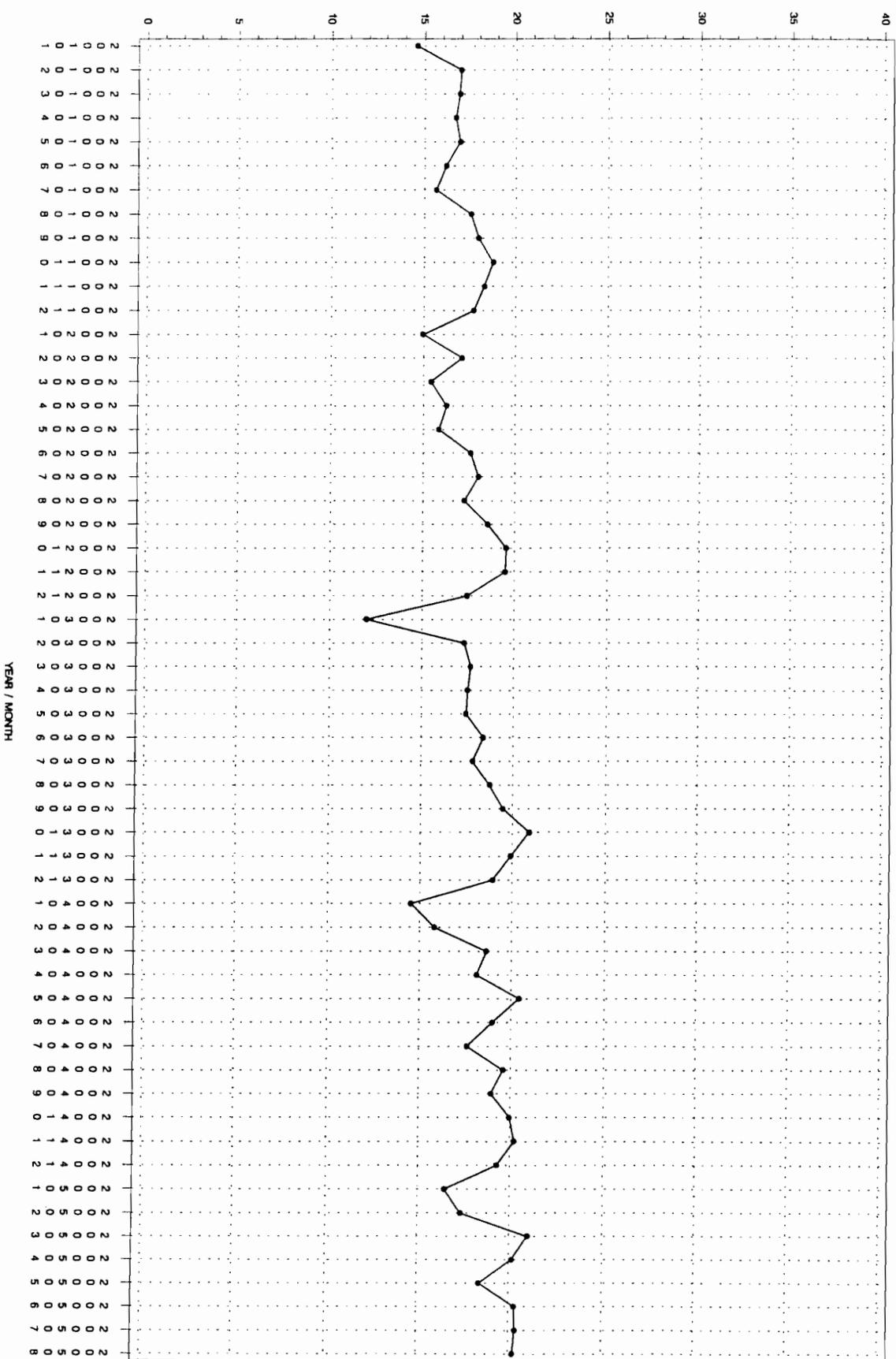
On the Wayzata sub, BNSF is currently averaging around 11 trains per day, ranging from 9 to 12 trains per day over the past six months. The limiting line capacity on the east end of the sub is 32 trains per day. There are no items for the Staples sub in the five year capital expansion plan.

**Bighorn sub (Sheridan - Gillette)**

On the Bighorn sub, BNSF is currently averaging around 27 trains per day, ranging from 23 to 29 trains per day over the past six months. The limiting line capacity on the Sheridan – Gillette portion of the sub is 32 trains per day. There are no items for the Bighorn sub in the five year capital expansion plan.

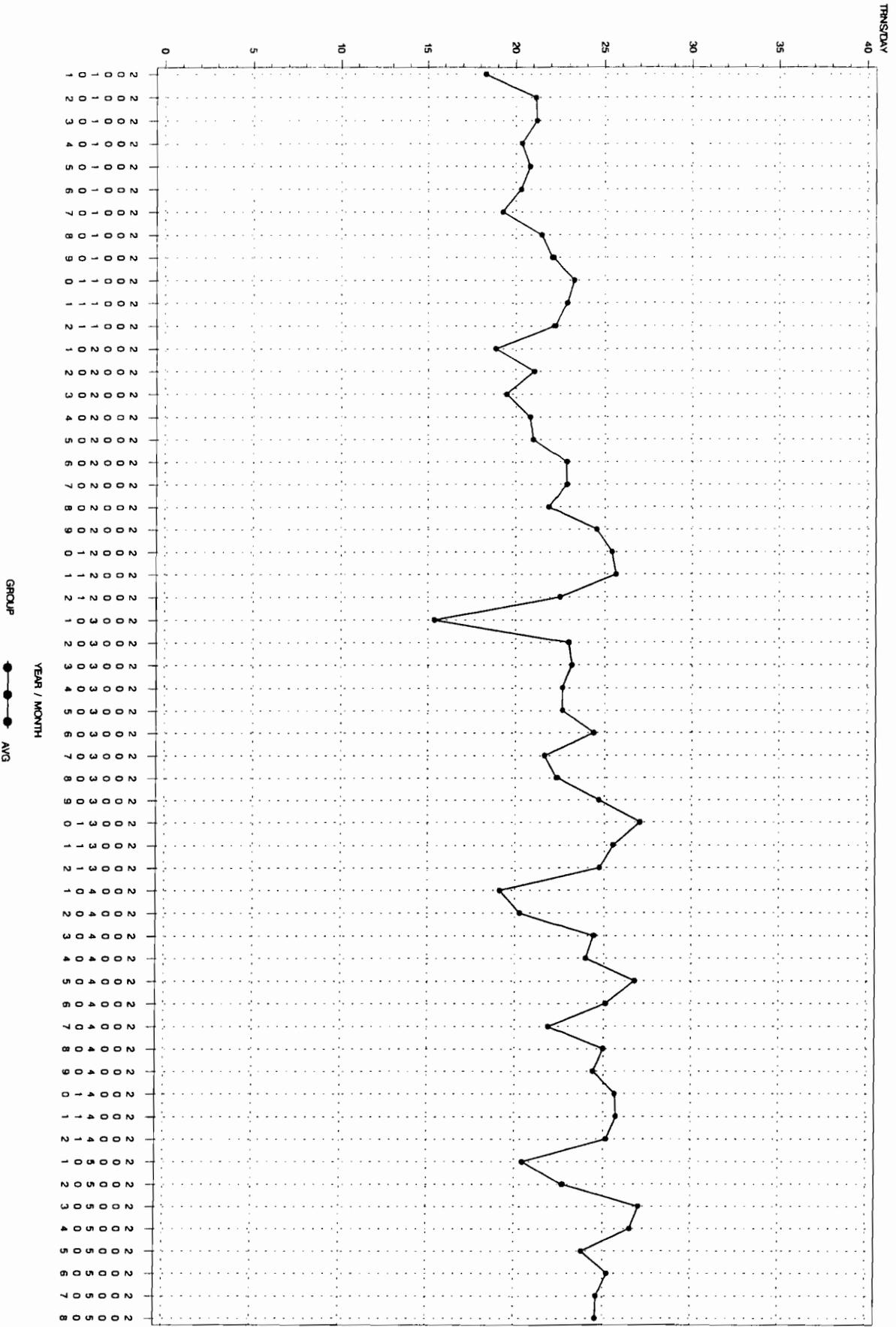
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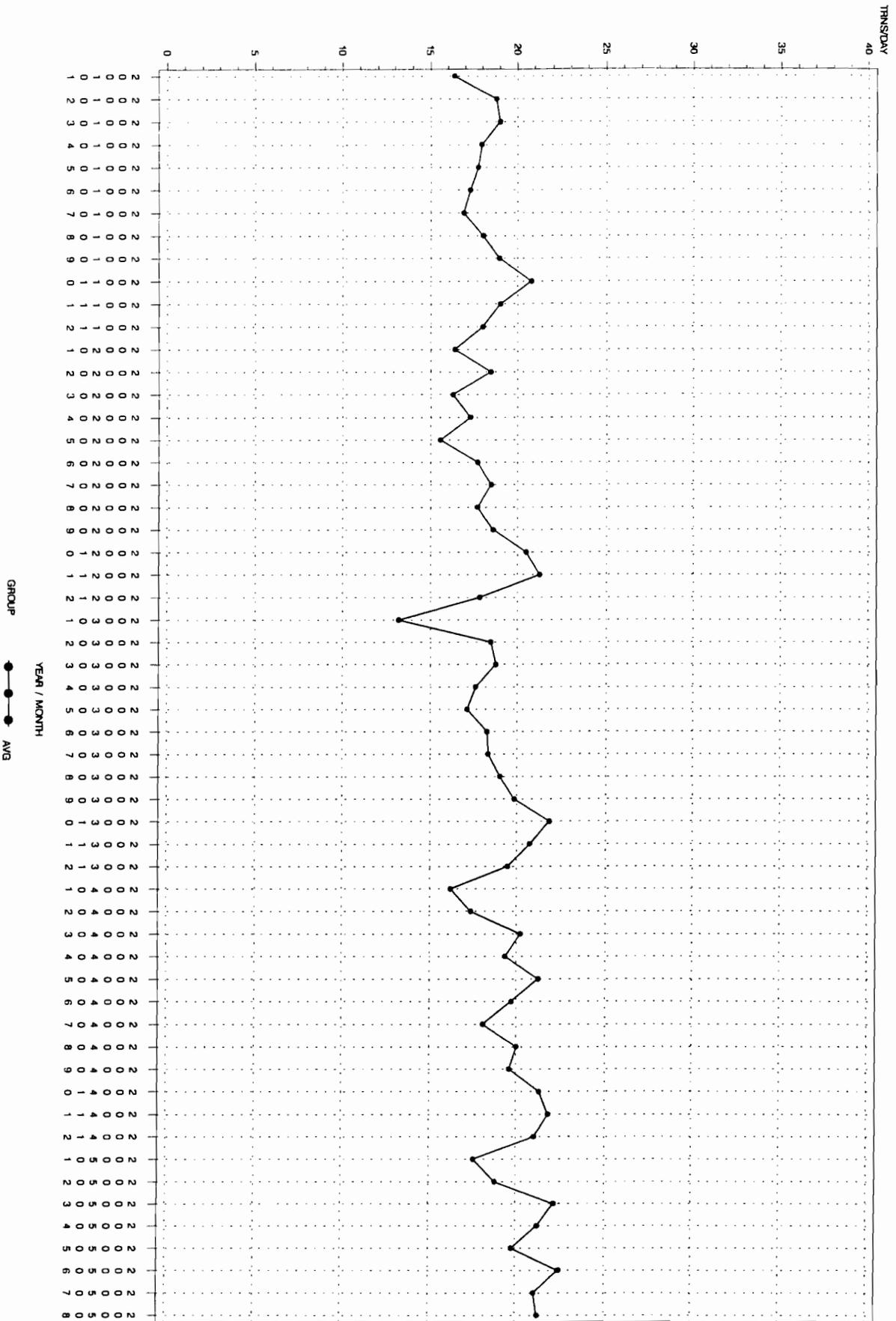


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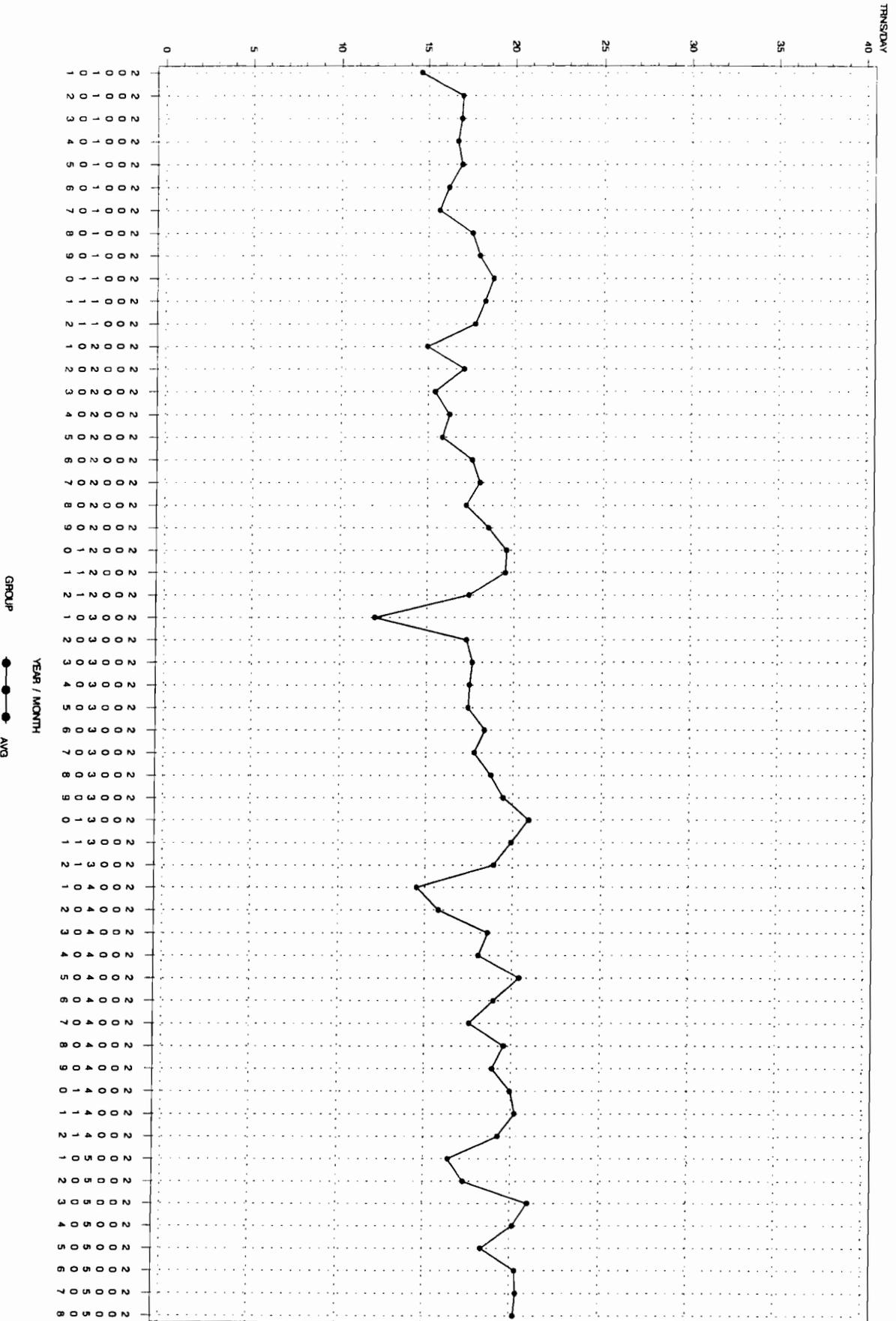
# SUBDIVISION DAILY TRAIN COUNTS DICKIN - W



# SUBDIVISION DAILY TRAIN COUNTS FORSYT



# SUBDIVISION DAILY TRAIN COUNTS JAMEST



# SUBDIVISION DAILY TRAIN COUNTS BIGHOR

