



Targa Liquids Marketing and Trade LLC
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Via E-Filing

February 14, 2022

Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

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ENTERED
Office of Proceedings
February 14, 2022
Part of
Public Record

RE: Gulf Coast Passenger Service Between New Orleans and Mobile
STB Finance Docket No. 36496

Dear Ms. Brown:

Targa Liquids Marketing and Trade LLC ("Targa"), an affiliate of Targa Resources Corp., is located in Harris County, Texas and relies on the freight rail service provided by CSX Transportation, Inc. ("CSXT"). I write on behalf of Targa to express concerns regarding the impact on that freight rail service of Amtrak's proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama.

Targa ships various types of liquefied petroleum gas and relies on CSXT to transport these products to refineries, petrochemical manufacturers, and wholesale fuels marketing and distribution centers throughout the eastern United States. Freight rail service is critical to the success of our business, and CSXT provides us access to two major port terminals in New Orleans and Mobile through which we can access greater domestic and international markets than would otherwise be available. The quality of service CSXT provides makes freight rail the most efficient transportation alternative to maintain and grow our business.

It is our understanding that CSXT and Norfolk Southern Railway Company have submitted evidence, including a Rail Traffic Controller study, that shows the introduction of Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to freight service. This harm will manifest itself through decreased freight train speeds and delay as well as extreme operational variability. CSXT's local trains, the very trains that directly serve our facility, will be hit the hardest.

Targa currently faces major challenges with delays in Mobile, Alabama due to the current volume of railcars and train schedules. Targa's understanding is that, with the two round trips per day that Amtrak is proposing, CSXT would be unable to service Targa's freight rail while Amtrak's trains are running. If true, this could potentially add several days to each Targa railcar movement (both departing and returning) from Pascagoula, Mississippi to all other points in Florida, Alabama, and Tennessee. This delay would significantly impair Targa's ability to meet our sales demands at our terminals in Alabama, Florida and Tennessee and would also negatively impact the residents of those states. Propane is used for automotive fuel, petrochemical feedstock, and, most importantly, home heating. Without propane, many people throughout the nation would not have a reliable, cost-effective and safe way to heat their homes. Butane is used as a petrochemical feedstock and as blending stock to produce motor gasoline, and consistent and timely shipments of butane and petrochemical feedstocks are critical to the continuous operation of many U.S. refineries and petrochemical facilities. Amtrak's proposed new service would cause shipping delays and logistic bottlenecks that could negatively impact much of the region's supply of liquified petroleum gases.

Targa does not oppose Gulf Coast passenger service and expresses no opinion on the merits of that service. However, it is important to Targa that the introduction of this passenger service does not decrease the quality of freight service provided by CSXT. It is our understanding that CSXT and NSR have proposed infrastructure

projects that would support Amtrak's desired passenger service while protecting the quality of freight service that Targa relies on. Targa urges the Board to seriously consider the merits of these projects.

Sincerely,

Targa Liquids Marketing and Trade LLC



Bruce Leonard
Vice President

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cc: FD 36496 Service List