

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

NuStar Pipeline Operating Partnership, L.P.,)	
)	
)	Docket No. 15-0646
)	
Application pursuant to Section 15-401 of the)	
Common Carrier by Pipeline Law and Sections)	
8-503 and 8-509 of the Public Utilities Act for a)	
Certificate in Good Standing to Operate an)	
Anhydrous Ammonia Pipeline as a Common)	
Carrier Pipeline and to Construct and Operate an)	
Extension Thereto and When Necessary to take)	
Private Property as Provided by the Law of Eminent)	
Domain.)	

UPRR’S VERIFIED PETITION TO INTERVENE

Union Pacific Railroad Company (“UPRR”) submits this Verified Petition to Intervene pursuant to Rule 200.00 of the Commission’s Rules of Practice, 83 Ill. Adm. Code §200.200. In support of its Verified Petition, UPRR states:

1. The focus of this proceeding is for the authorization of NuStar Pipeline Operating Partnership L.P. (“NuStar”) to operate and maintain an anhydrous ammonia pipeline (the “Pipeline”) in Illinois a portion of which will cross the UPRR’s Line of railroad, on the St. Louis Service Unit, Pana Subdivision, (the “UPRR Line”) near (AAR/DOT #922.116X), at MP 189.00 (the “Route 128 Crossing”). Currently there exists a grade separation at the Route 128 Crossing which carries Route 128 over the UPRR Line. The proposed NuStar Pipeline crossing of the UPRR Line near the Route 128 Crossing will impact UPRR’s current and future common carrier operations and will require a crossing by the NuStar Pipeline of the UPRR Line.

2. In order to protect UPRR’s common carrier operations UPRR seeks permission to intervene as a respondent to assure that the location, construction, maintenance and interaction with UPRR operations and facilities is acceptable to UPRR’s chief engineer, complies with all

applicable laws regulations and operating rules of UPRR and adequately compensates UPRR for the partial taking of its ROW.

3. UPRR agrees to accept service by electronic means as provided in Section 200.1050 of the Commission's Rules of Practice, 83 III. Adm. Code §200.1050.

4. UPRR agrees to accept the status of the record as it exists at the time of its intervention.

5. For purposes of the Service List, all documents should be served on the following:

Mack H. Shumate, Jr., #2595532
Senior General Attorney
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101 N. Wacker Drive, Suite 1920
Chicago, Illinois 60606
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Fax: 877.213.4433
mackshumate@up.com

WHEREFORE, Union Pacific Railroad Company prays that its Verified Petition to Intervene be granted and that Union Pacific Railroad Company be treated as a party to this proceeding.

Dated: January 20, 2016

Respectfully submitted,



By: _____

Mack H. Shumate, Jr., #2595532
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CERTIFICATE OF SERVICE

The undersigned certifies that copies of the foregoing instruments were served upon the addresses listed below by U.S. Mail, or the email address provided this January 20, 2016.

Deborah A. Bone
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Mack H. Shumate, Jr.

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NOTICE OF FILING

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on January 20, 2016, I filed via e-file, with the Illinois Commerce Commission, the attached Petition to Intervene, a copy of which is hereby served upon you.

Respectfully submitted,



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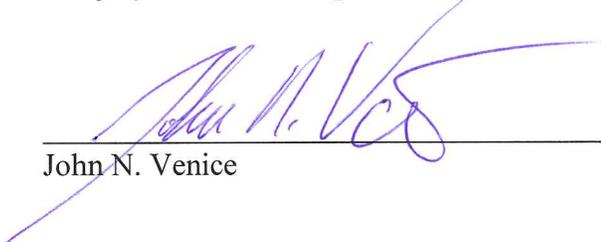


Mack H. Shumate, Jr.

VERIFICATION

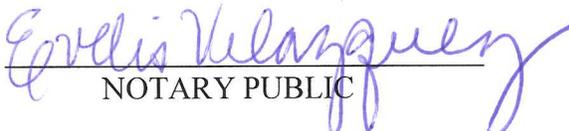
STATE OF ILLINOIS)
)
COUNTY OF COOK) SS

I, John Venice, Manager Industry and Special Projects for the Petitioner, Union Pacific Railroad Company, hereby certify pursuant to 735 ILCS 5/1-109 that I have read the foregoing Petition to Intervene and the matters contained therein are believed true and correct based upon the information provided to me and reasonable inquiry made with respect to same



John N. Venice

SUBSCRIBED and SWORN to before me this 20th day of January, 2016.



NOTARY PUBLIC

