Florida East Coast
RAILWAY, L.L.C.

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Jacksonville, Florida 32256
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September 3, 2014

Mr. Karl Alexy
Federal Railroad Administration
Hazardous Materials Division, West Building
1200 New Jersey, Avenue S. E.
Washington DC, 20590

Subject: Florida East Coast Railway Request for Concurrence to Move LNG Loads by Rail

Dear Mr. Alexy,

Florida East Coast Railway (FECR) is requesting concurrence from the FRA to begin shipping liquid natural gas (LNG) in common carrier rail service. The scope of this request is specific to rail shipments of LNG having both origination and destination points on the FEC network. However, final delivery of the LNG shipments may be performed by a certified highway common carrier to FECR customer facilities.

Origin/Destination

Initial proposed shipments of LNG on FECR will originate from a rail served liquefaction facility, currently being constructed by LNG Holdings, LLC, in Miami, FL, and the initial delivery point will be FECR Bowden Yard in Jacksonville, FL. Shipments would begin upon completion of the facility which could be as early as Q2 2015. Potential customers for these rail shipments will likely be Crowley Maritime Corporation and/or LNG Holdings, LLC. However, future rail deliveries may include destination points at other rail terminals on the FECR network.

FECR understands that such concurrence, if granted, would be for shipments confined to its rail network and that interchange of these shipments with another railroad would need to be handled under a separate request for concurrence.

Containment and Loading

The specific LNG container that will be utilized to ship LNG on the FECR rail network will be a standard UN T-75 ISO certified cryogenic container which is acceptable to be loaded upon railcars in Intermodal service. The specific UN T-75 ISO containers utilized by FECR will be 20 feet or 40 feet in nominal length, and not exceeding 11,000 gallons of LNG per container.

LNG containers will be loaded in a single stack configuration, which shall be adhered to regardless if loaded or considered empty. Initially, the total number of loaded containers to be shipped will be approximately 10-20 containers per day depending on the container size, production at facility, switching frequency, etc. This volume would be gradually ramped up