

May 28, 2025

John Lovenburg
Vice President, Environmental
BNSF Railway
2500 Lou Menk Drive, AOB-3
Fort Worth, Texas 76131
John.Lovenburg@bnsf.com

Dear Mr. Lovenburg,

The California Air Resources Board (CARB) received BNSF Railway's (BNSF) 2024 Fleet Average Agreement Annual Compliance Report (Compliance Report) pursuant to Section IV.B. of the 1998 Memorandum of Mutual Understanding and Agreements, South Coast Locomotive Fleet Average Emissions Program (1998 MOU). CARB staff have confirmed that for calendar year 2024 BNSF complied with the 1998 MOU requirement to achieve a final locomotive fleet average for oxides of nitrogen (NO_x) under 5.5 grams per brake horsepower-hour (g/bhp-hr) in the South Coast Air Basin.

Compliance Evaluation: Calendar Year 2024

BNSF's Compliance Report included the following:

1. Signed letter of certification verifying the information reported is true, accurate, and complete.
2. Fleet average calculation showing the individual locomotive megawatt-hours (MWh) and emissions levels, as well as calculations and any necessary adjustments (Form F-A-1 through Form F-A-6).

BNSF's 2024 Compliance Report included activity information and emissions levels for over 5,000 locomotives. BNSF's 2024 final fleet average of 5.4 g/bhp-hr meets the NO_x compliance level set forth in the 1998 MOU.

CARB will make the Compliance Report information publicly available except for individual locomotive activity levels, which are business confidential according to California Government Code Section 6254.7. The activity data will be aggregated by tier and emission level.

If you have any questions or comments, please contact:
Layla Gonzalez, Manager, Freight Systems Section at Layla.Gonzalez@arb.ca.gov or
Jaskamal Kaur, Air Pollution Specialist, Freight Systems section at
Jaskamal.Kaur@arb.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ajay Mangat".

Ajay Mangat, Assistant Division Chief, Transportation and Toxics Division

cc: Allen Doyel, Senior Attorney, BNSF, Allen.doyel@bnsf.com
Ashley Lane, Environmental Manager, BNSF, Ashley.lane2@bnsf.com
Layla Gonzalez, Manager, Freight Systems Section, Transportation and Toxics
Division
Jaskamal Kaur, Air Pollution Specialist, Transportation and Toxics Division