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VIA ELECTRONIC MAIL

August 26, 2025

Danielle Gosselin
Director, Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-000
Danielle.Gosselin@stb.gov

Re: STB Docket No. FD 36873, Union Pacific Railroad Company and Norfolk Southern Railway Company Proposed Merger: Request for Approval of Vanasse Hangen Brustlin, Inc. as Independent Contractor & Waiver of Prefiling Notice Requirement

Dear Director Gosselin:

On behalf of Union Pacific Railroad Company (UP) and Norfolk Southern Railway Company (NS), as part of the proposed merger, we would like to engage Vanasse Hangen Brustlin, Inc. (VHB), an approved third-party contractor, to work with the Office of Environmental Analysis (OEA) to prepare the necessary environmental documentation associated with the merger. We respectfully request approval of this selection in accordance with 49 C.F.R. § 1105.10(d).

Pursuant to 49 C.F.R. § 1105.10(d), we expect and understand VHB's work will be performed under the OEA's direction, supervision, and control. We can confirm that VHB is not presently engaged in any other projects for UP or NS.

Pursuant to 49 C.F.R. § 1105.10(c) and (d), we also request a waiver of the prefiling notice required by 49 C.F.R. § 1105.10(a)(1). Early engagement of the third-party contractor, if approved by OEA, warrants waiver of this environmental reporting requirement.

We look forward to your review of our request and are prepared to sign a disclosure statement upon approval. If you have any questions, please reach out.

Best regards,

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Peter Whitfield

Counsel for NS

CC:

Elizabeth Webster, STB
Alan Summerville, VHB