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December 17, 2025

By E-Filing

Ms. Cynthia T. Brown
Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. NOR 42185, *Weskan Grain LLC v. Kansas & Oklahoma Railroad, LLC*

Dear Ms. Brown:

Accompanying this letter for filing in the captioned docket on behalf of Weskan Grain LLC are (1) a Pre-Filing Notice of Complaint filed pursuant to 49 C.F.R. §1111.1(a) and (2) a Motion for Protective Order filed pursuant to 49 C.F.R. §1104.14(c). Although there is no requirement that the attached filings are to be served on the defendant in a potential case, Weskan informs the Board that courtesy copies of these filings are being furnished to representatives of the Kansas & Oklahoma Railroad, LLC.

Please do not hesitate to call me if you have any questions.

Sincerely,

Thomas W. Wilcox
Attorney for Weskan Grain LLC

Enclosure

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

WESKAN GRAIN LLC	)	
	)	
Complainant,	)	
	)	
v.	)	Docket No. NOR 42185
	)	
KANSAS & OKLAHOMA RAILROAD, INC	)	
	)	
Defendant	)	
	)	

**PRE-FILING NOTICE OF COMPLAINT CHALLENGING
THE REASONABLENESS OF A RAIL RATE**

Pursuant to 49 C.F.R. §1111.1(a), Weskan Grain LLC (“Weskan”) hereby submits this notice prior to filing a formal complaint against the Kansas & Oklahoma Railroad, LLC (“K&O”) challenging the reasonableness of a rate K&O has established for rail transportation of grain commodities that Weskan ships. This pre-filing notice is required because the reasonableness of the challenged rate may be determined by applying the Board’s Stand-Alone Cost (“SAC”) methodology.¹

Weskan supplies the following information in accordance with §1111.1(a)(1) – (3):

- (1) The rate to be challenged is the \$1,170 rate K&O established in response to a formal request made by Weskan pursuant to 49 C.F.R. Part 1300 (See Exhibit A).
- (2) The rate applies to transportation from two closely approximated grain loading facilities

¹ The reasonableness of the rate may also be tested by rate reasonableness methodologies other than SAC.

owned by Weskan in the vicinity of Scott City, Kansas to Weskan's grain elevator facility located near Sheridan, Colorado.

(3) The affected commodities are Sorghum, Wheat and Corn.

Pursuant to §1111.1(a)(4) Weskan has accompanied this pre-filing notice with a motion for adoption of a protective order that complies with 49 C.F.R. §1104.14(c).

Respectfully submitted,

/ss/ Thomas W. Wilcox

Thomas W. Wilcox

Law Office of Thomas W. Wilcox, LLC

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202-508-1065

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Attorney for Weskan Grain LLC

December 17, 2025

EXHIBIT A



Weskan Grain, LLC
72225 Highway 96
Sheridan Lake, CO 81071

November 12, 2025

VIA EMAIL

Zach Boehme
Kansas & Oklahoma Railroad, LLC

Re: Request for Rates, Charges and Service Terms

Dear Mr. Boehme:

Pursuant to 49 C.F.R. 1300.2, Weskan Grain LLC hereby formally requests from the Kansas & Oklahoma Railroad, LLC (K&O), the existing rate(s) (or the basis for calculating the rate(s)), as well as all charges and service terms, that would apply to the following transportation requested by Weskan Grain:

The movement of railcar loads of grain commodities from Weskan's sidings located at (1) 701 N Taos Rd, Scott City (the Scott City East facility) and (2) 202 N Main St, Scott City (the Scott City (Kirk) facility) to and from tracks owned by the Colorado Pacific Railroad ("CXR") at Weskan's Stockton grain elevator facility, located at approximately MP 752.5 of the tracks of the CXR.

The particulars of the requested transportation are as follows:

1. Commodities: Sorghum, Wheat and Corn
2. Equipment: Open hopper cars supplied by K&O.
3. Train size: Scott City East: 75-car shuttle trains; Kirk: Single Car
4. Request presumes that K&O and CXR reach agreement on the terms for K&O access to destination.

In addition to the foregoing information, Weskan requests notification of any future increases in the rate(s) involved or changes in pertinent service terms.

In the event K&O does not have existing rates, charges and service terms for the requested transportation, Weskan asks K&O to establish such rates, charges and service terms within the time frames established by 49 C.F.R. §1300.3 and provide them to Weskan.

Weskan requests and agrees that K&O may supply the requested information to me electronically at the email address below.



Weskan Grain, LLC
72225 Highway 96
Sheridan Lake, CO 81071

We look forward to your response, and please call if you have any questions.

Will Bramblett

Weskan Grain CEO
wbramblett@weskangrain.com
Office 719-793-9700
Cell 830-328-2028

From: Jason Anderson <Jason.Anderson@Watco.com>
Sent: Friday, December 5, 2025 12:27:26 PM
To: Will Bramblett <wbramblett@weskanrain.com>
Cc: Zachary G. Boehme <Zachary.Boehme@Watco.com>; Michael E. Gray <mgray@watco.com>; Brett C. Jensen <Brett.Jensen@Watco.com>
Subject: K&O rate offer to Weskan rate request from Scott City to Stockton

Hello Will,

The K&O can offer the following rate:

Rate:

- \$1,170 per car

Origin:

- Weskan's facility located at 202 N. Main St, Scott City, KS (Scott City Kirk facility)
- Weskan's facility located at 701 N Taos Rd, Scott City, KS (Scott City East facility)

Destination:

- Weskan's Stockton grain elevator facility, located at approximately MP 752.5 of the tracks of the Colorado Pacific Railroad

Commodities:

- Sorghum, Wheat, and Corn

Equipment:

- Hopper cars supplied by K&O Railroad

Train size:

- Manifest service from Scott City Kirk Facility
- Manifest service from Scott City East Facility with maximum of 25 loaded cars pulled per service.

Key Terms:

- Rates are subject to KO/Watco fuel surcharge program
- Rates are only applicable for Weskan Grain origins and destinations
- Rates effective: 12/01/2025 - 11/30/2026
- Rates are applicable pending approval by the Surface Transportation Board of Kansas & Oklahoma Railroad's Petition for Exemption with the proposed removal of the interchange commitment for traffic destined for interchange at Towner, Colorado.

Please advise if the rate should be published.

Jason Anderson

Director, Railroad Sales

Watco

(913) 636-2597 (C)

jason.anderson@watco.com

