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ENERGY AND PUBLIC WORKS

CHAIR - ECONOMIC DEVELOPMENT

FINANCE

REVENUE

RULES



HOUSE OF DELEGATES
WEST VIRGINIA LEGISLATURE

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October 22, 2025

FD 36873

The Honorable Patrick J. Fuchs

Chairman

Surface Transportation Board

395 E Street SW

Washington, D.C. 20423

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ENTERED

Office of Chief Counsel

November 13, 2025

Part of

Public Record

Subject: Support for the Union Pacific and Norfolk Southern Merger

Dear Chairman Fuchs,

As a lifelong West Virginian representing the Mountain State in the House of Delegates and as a small business owner, I know how vital reliable rail service is to our economy, our businesses, and our residents. The proposed merger between Union Pacific Railroad and Norfolk Southern Corporation presents a unique and timely opportunity not only for West Virginia but for the entire Appalachian and Mid-Atlantic region.

Why this merger is good for West Virginia

West Virginia's economy depends heavily on freight rail for coal, minerals, manufacturing materials, and regional goods. Improved service, capacity, and network reach will give our businesses dependable access to national and international markets. The merger promises faster and more reliable service, less congestion, and greater market access for our communities. This will make West Virginia more competitive in a global economy. It will also bring investment in rail infrastructure which means new jobs in construction and maintenance and stronger transportation corridors to serve our towns and industries. For our coal industry this merger could be especially important. West Virginia leads the nation in coal exports and improved logistics directly reduce cost per ton. International buyers are very sensitive to transportation costs and the ability to move coal efficiently and affordably helps our miners stay competitive.

Stronger trade and export routes through the West Coast

As trade across the Pacific Rim grows, West Virginia stands to gain from better rail links to West Coast ports. The State of West Virginia recently opened a trade office in Taiwan to promote exports and attract Taiwanese investment. Taiwan is already one of our key partners, with trade totaling nearly 175 million dollars in 2022. This merger will provide a direct rail route from the West Coast ports for both imports and exports, complementing our traditional East Coast connections. It will help create a true coast to coast network that gives West Virginia businesses more options to reach global markets. For coal exports in particular, an efficient route to West Coast ports will open new opportunities in the Pacific Rim. Lower transportation costs make West Virginia coal more competitive in Asia and help sustain our export base.

Benefits for West Virginia coal and international competitiveness

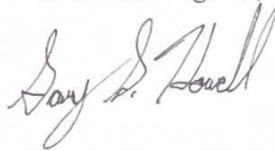
Improving the rail network's efficiency and creating westbound access strengthens the economics of

exporting coal to global markets. Reduced rail costs and faster delivery lower the total cost of coal shipped overseas, improving the position of West Virginia producers in world markets. This will support jobs in mining, rail logistics, and port operations while increasing severance tax revenues that benefit our schools, roads, and communities. When West Virginia coal becomes more competitive worldwide, it strengthens our energy industry and keeps our state moving forward.

Conclusion

On behalf of my constituents in West Virginia, I respectfully urge the Surface Transportation Board to approve the Union Pacific and Norfolk Southern merger so our state can take advantage of the efficiencies, investments, and opportunities it offers. This merger will connect Appalachian freight and exports to the global economy, strengthen trade with Taiwan and the Pacific Rim, and promote West Virginia coal on the world stage.

With warm regards,

A handwritten signature in cursive script, reading "Gary D. Howell". The signature is written in dark ink and is positioned above the printed name.

Delegate Gary Howell

cc: Member Schultz
Member Hedlund