

August 7, 2026

Jay C. Johnson

T 202.344.4698
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Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. FD 36500, Cave Springs Isolated Find

Dear Ms. Gosselin:

I am writing to provide more information on the projectile point find at the capital improvement project near Cave Springs, Oklahoma (not Arkansas).

As you know, CPKC's thirteenth quarterly environmental mitigation measures report described this projectile point find and included photographs. Because you asked for more information, we are attaching a more detailed Technical Memorandum that explains what happened.

In short, CPKC followed its monitoring plan for cultural resources (EI-33023) at the Cave Springs site. The find—an above-ground projectile point—was made by an on-site archeologist who was walking the construction site. As soon as the find was made, the on-site archeologist contacted the SOI-qualified senior archeologist (i.e., the Project Investigator). Work stopped in the area near the find. Because the on-site archeologist and senior archeologist agreed that the find was not significant, paragraph 3.4.1 of the monitoring plan did not require CPKC to “halt temporarily” its “construction work within the site boundary,” or take any further action.

Going beyond what the monitoring plan required to ensure that no other artifacts were present, the on-site archeologist performed further observation and shovel testing. That observation and testing confirmed the projectile point was an “isolated find,” defined in paragraph 3.5.1 of the monitoring plan as “a single artifact or fewer than 5 artifacts within a 10 meter radius.” The monitoring plan requires CPKC to contact OEA only “[i]f 5 or more artifacts are encountered within a 10 meter radius.” The plan works this way because isolated finds lack the contextual association and subsurface stratigraphic integrity to yield significant historical or pre-contact data.

Danielle Gosselin
August 7, 2026
Page 2

As a result, isolated finds by nature cannot be eligible for listing in the National Register of Historic Places.

In the future, CPKC will be clearer about its process for an insignificant discovery in its quarterly reports. And, of course, if a significant find is made, and that find is not isolated, CPKC will immediately contact OEA as discussed in paragraph 3.5.1 of the monitoring plan.

As always, we are happy to discuss these issues with you and will continue to provide notice to OEA on its compliance with all environmental mitigation measures in its quarterly reports. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay C. Johnson".

Jay C. Johnson

Enclosure

cc: Elizabeth Webster
Alan Tabachnick
Joe Van Humbeck
Glen Wilson
Alan Summerville
Waymon Peer



TECHNICAL MEMORANDUM

To: Joe Van Humbeck
Director Impact Assessment & Natural Environment, CPKC
Submitted via email: joe.vanhumbeck@cpkcr.com

From: Josh Fletcher, Senior Archaeologist-Principal Investigator

Date: August 4, 2026

Re: **Project Name: Cave Springs; Subdivision: Heavener
March 16, 2026 Projectile Point Isolated Find**

HDR, Inc. (HDR) has been tasked with monitoring for cultural resources during the construction of merger-related capital improvements along the Canadian Pacific Kansas City (CPKC) rail right-of-way. Under the direction of SOI-qualified Senior Archaeologist Josh Fletcher (Principal Investigator [PI]), HDR archaeologist Erika Niemann monitored ground-disturbing activities associated with railroad siding construction at the Cave Springs Siding (Milepost 266.30 to 269.0 of CPKC's Heavener Subdivision) from February 16 to April 1, 2026.

At the end of the workday on March 16, 2026, Ms. Niemann observed a Native American projectile point on the ground surface at station 11+00 along the inside of the silt fence. She looked in the surrounding areas (approximately 30 meters north and south of the find on either side of the silt fence) and did not observe any additional artifacts. The areas surrounding the projectile point location within the silt fence had been heavily disturbed and filled with ballast. Per the Monitoring Plan, she contacted the PI to discuss the find. The photos at the end of this memo present views of the projectile point and the area from which it was recovered.

On the morning of March 17, 2026, per the Monitoring Plan, Ms. Niemann contacted the PI and HDR's project manager Rachael Crandley to further discuss the find. She also contacted CPKC's Kyle Kosovich to relay the information that a projectile point had been found, gave the location, confirmed that work did not need to be stopped except in areas near the find, and that she and the PI had a plan to further explore the area via shovel testing.

On March 17, 2026, Ms. Niemann excavated a shovel test approximately one meter from the projectile point location. Several questionable possible lithic flakes were recovered from near the ground surface, though they were likely redeposited by runoff from the surrounding disturbed areas of ballast. She observed no additional artifacts in the area. On March 19, 2026, she excavated a total of three additional shovel tests at 15-meter intervals north and south of the find location; none of these shovel tests produced artifacts. The projectile point was likely redeposited by silt fence installation or was mixed in with the ballast and then exposed by recent rain events.

Ms. Niemann and the PI determined that the projectile point was an isolated find, which by definition is not eligible for listing in the National Register of Historic Places (NRHP), and is not significant.

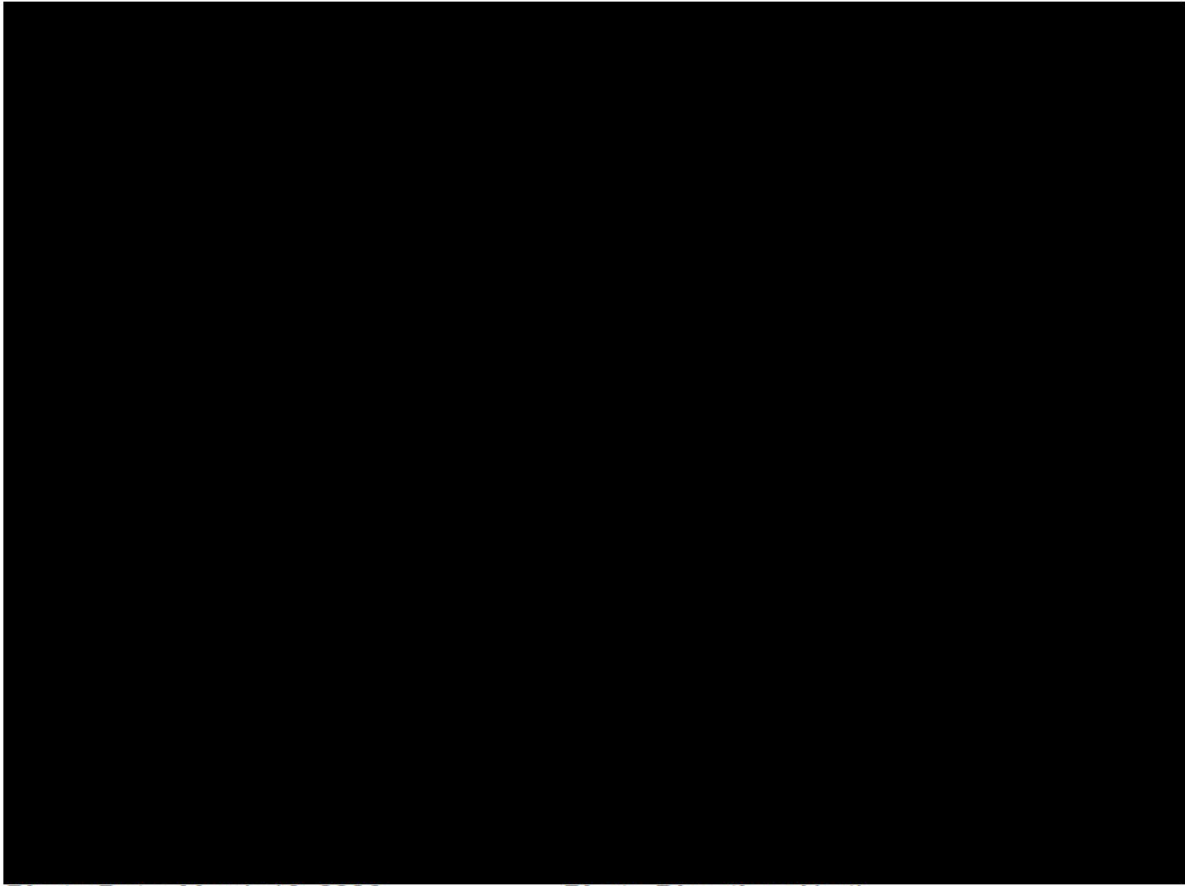


Photo Date: March 16, 2026

Photo Direction: North

Description of photo:



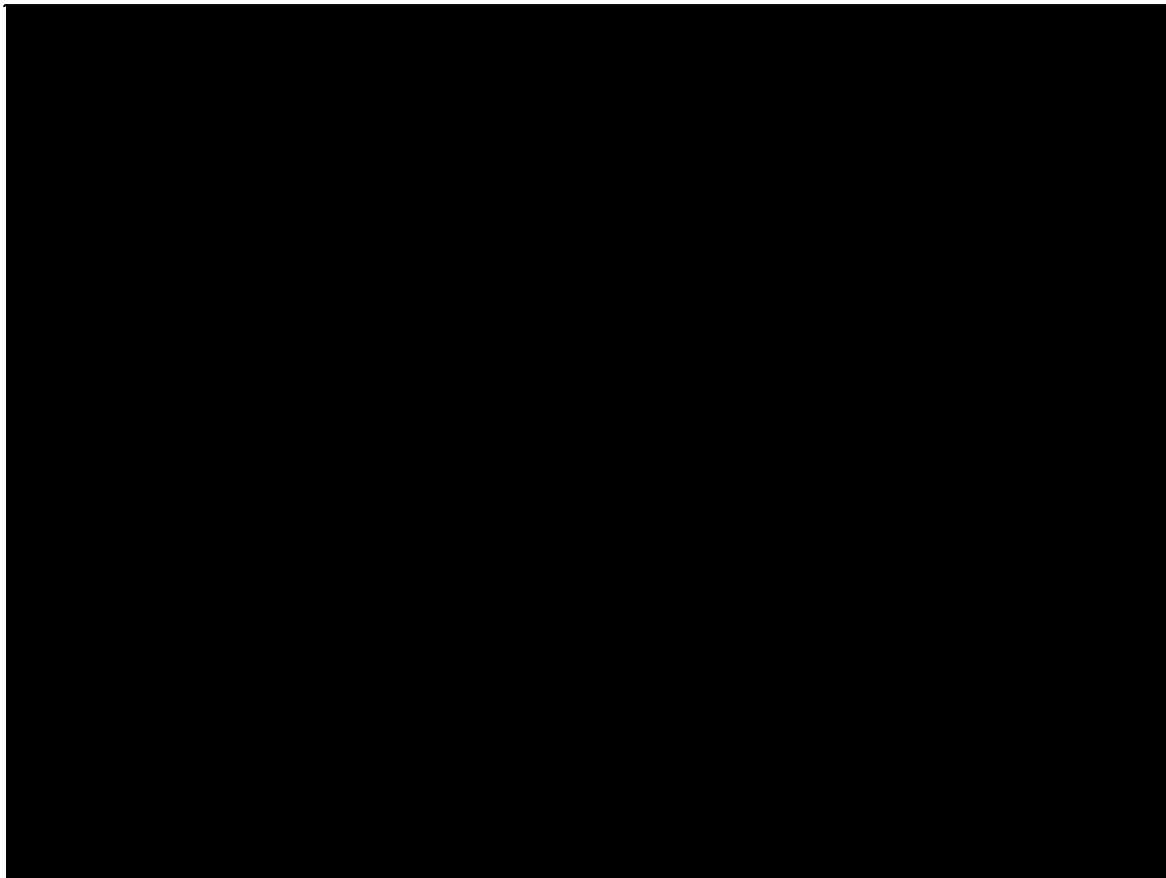


Photo Date: March 16, 2026

Photo Direction: North

Description of photo:



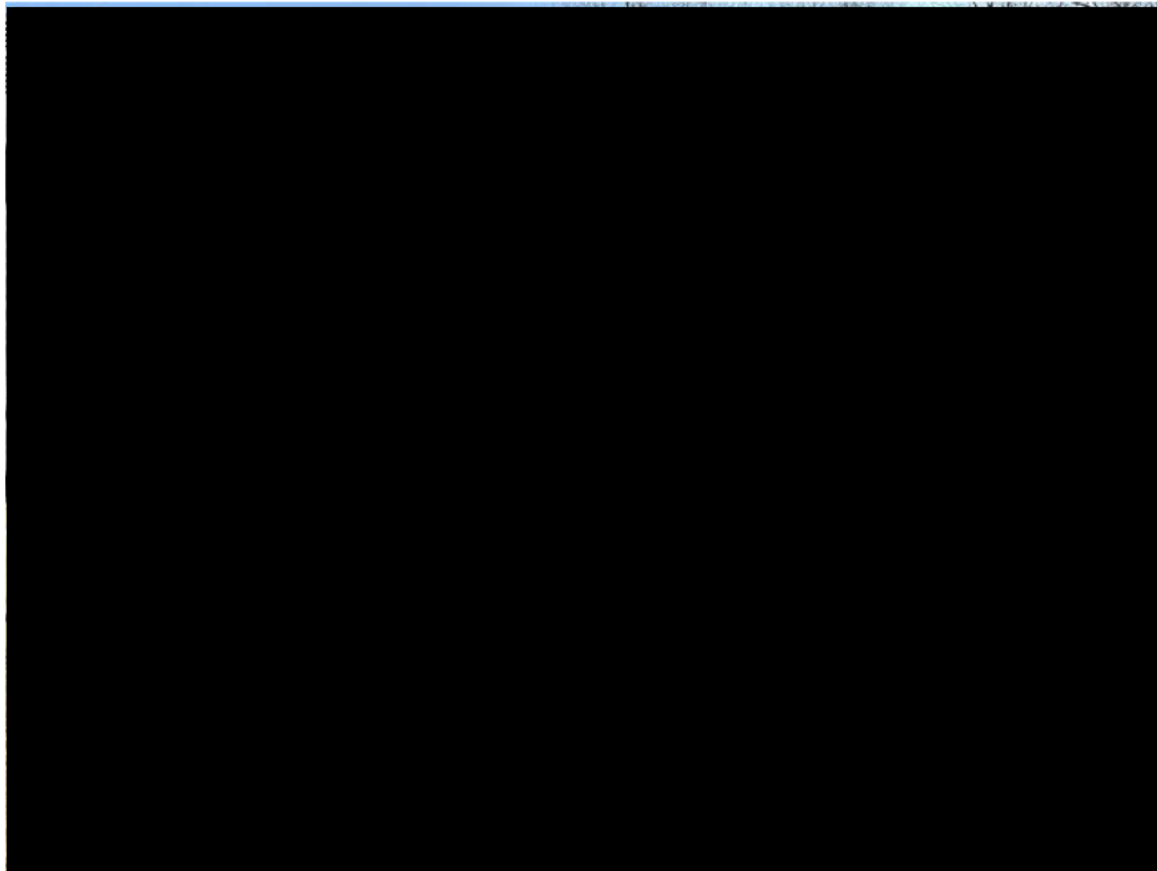


Photo Date: March 16, 2026

Photo Direction: South

Description of photo:

[Redacted description text]

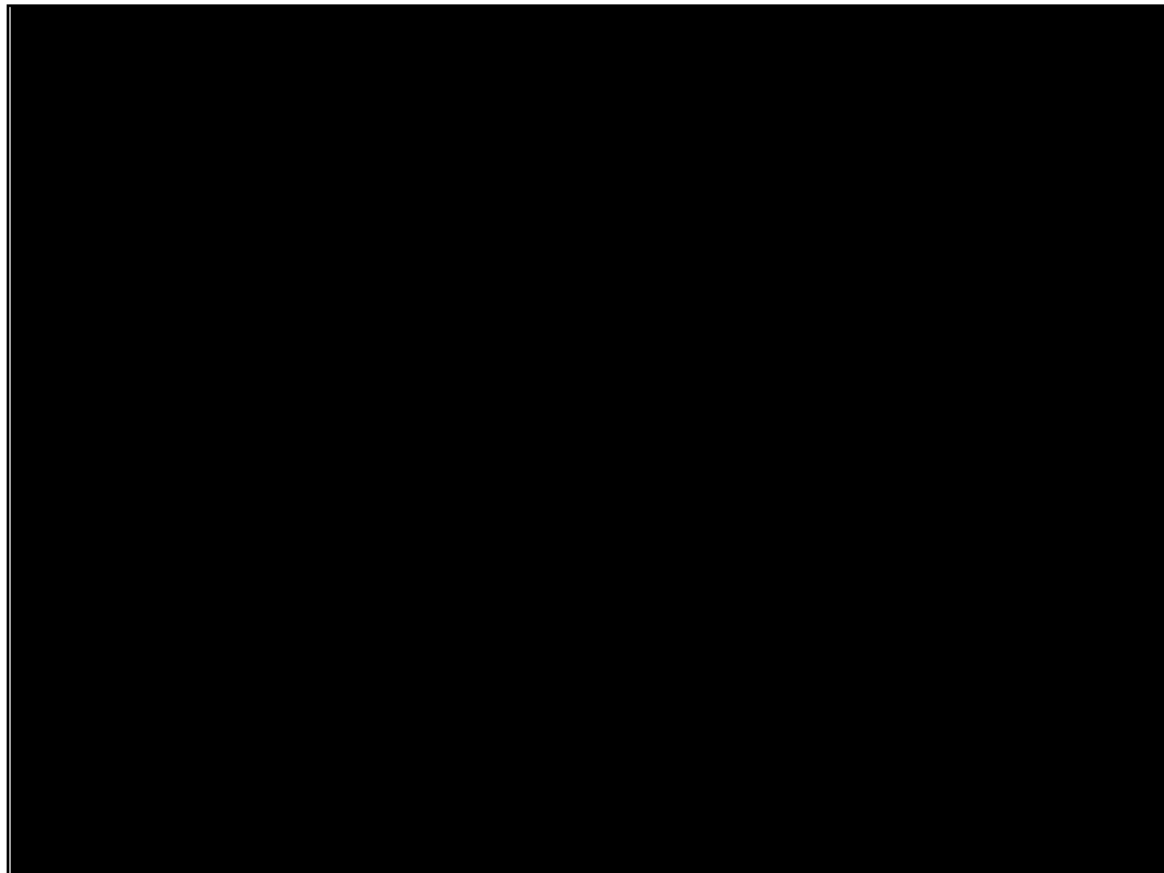


Photo Date: March 16, 2026

Photo Direction: West

Description of photo:

[Redacted description text]



Photo Date: March 16, 2026

Photo Direction:

Description of photo: Projectile point, likely made of Barren Fork chert.