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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Chief Counsel
September 25, 2026
Part of
Public Record

FINANCE DOCKET NO. 36873

**UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY —CONTROL—
NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY**

**DESCRIPTION OF ANTICIPATED RESPONSIVE APPLICATION FILED BY SHENANDOAN VALLEY
BATTLEFIELD FOUNDATION**

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Dated: September 9, 2026

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 36873

**UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY —CONTROL—
NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY**

**DESCRIPTION OF ANTICIPATED RESPONSIVE APPLICATION FILED BY SHENANDOAH VALLEY
BATTLEFIELD FOUNDATION**

The Shenandoah Valley Battlefield Foundation (“SVBF”) files this description of its anticipated responsive application in accordance with the Board’s Decision No. 30. To redress competitive harm and to enhance competition, SVBF (on behalf of itself and its wholly-owned subsidiary, the Manassas Gap Railroad, LLC) anticipates filing responsive application(s) to seek the divestiture of Norfolk Southern’s parallel line that is an approximately 49-mile rail line extending from approximately Milepost B51.0 near Riverton Junction in Front Royal, Virginia, to approximately Milepost B100 near Broadway, Virginia, in Rockingham, Shenandoah, and Warren Counties, Virginia, including connections to other railroads, and such other filings as may be necessary to effectuate that divestiture.

SVBF was established to manage the Shenandoah Valley Battlefields National Historic District, designated by Congress in 1996. SVBF has been leading the charge for several years to restore freight rail service to this line.

There is a strong need for rail service over this line. The Shenandoah Valley contains significant agricultural, industrial, and logistics activity that would greatly benefit from competition for rail freight service. Because the line parallels other Norfolk Southern lines in Virginia, Norfolk Southern has ignored it and the freight needs in the Shenandoah Valley. Accordingly, a divestiture will not harm Applicants.

Because Norfolk Southern has not been using this line, there is no harm to Norfolk Southern to the Board taking no action with respect to this line until the Board considers this anticipated responsive application and this proceeding is completed, which SVBF requests.¹

Respectfully submitted,

/s/ John M. Scheib

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¹ SVBF is not aware of any pending action at the Board related to this line, but Norfolk Southern may seek Board action related to this line during the pendency of this proceeding.

CERTIFICATE OF SERVICE

I certify that, on September 9, 2026, I have caused to be served a copy of the foregoing upon the Parties of Record in these proceedings.

/s/ John M. Scheib

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