ENTERED
Office of Chief Counsel
November 13, 2026
Part of
Public Record

**BEFORE THE**
**SURFACE TRANSPORTATION BOARD**

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**FINANCE DOCKET No. 36873**

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

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# NOTICE OF INTENT TO PARTICIPATE

The Office of the Wyoming Attorney General hereby gives notice of its intent to participate in the above-captioned docket and any related sub-dockets as a party of record. The Wyoming Attorney General's Office is an executive branch agency of the State of Wyoming. The Office's Water and Natural Resources Division has broad responsibilities surrounding the management of extractive industries within the State, including how the availability of transportation services may impact the viability of maintaining such extractive industries. Wyoming is the largest coal-producing state in the nation. Union Pacific Railroad operates extensively throughout Wyoming, including major lines serving the Powder River Basin coal region. Wyoming and the Attorney General's Office therefore have a significant interest in this decision and its potential effects on the transportation of coal and other natural resources. *See* 49 C.F.R. § 1180.1(m) (encouraging participation by state "government departments and agencies").

On August 18, 2026, the Surface Transportation Board (the "Board") issued a decision that, among other things, established the procedural schedule for these proceedings, including setting September 4, 2026, as the deadline to file notices of intent to participate in the proceedings. Union Pac. Corp.—Control—Norfolk S. Corp., (Decision No. 30), FD 36873 et al., slip op. at 13 (STB served Aug. 18, 2026). The Board later extended the deadline for notices of intent to

participate to September 30, 2026. Union Pac. Corp.—Control—Norfolk S. Corp., (Decision No. 35), FD 36873 et al., slip op. at 2 (STB served Aug. 31, 2026). Subsequently, recognizing the expansive nature of these proceedings, the Board explained that it "will accept late-filed notices of intent that are filed before the comment deadline of November 18, 2026, without requiring filers to move for leave." Union Pac. Corp.—Control—Norfolk S. Corp., (Decision No. 45), FD 36873, at 9 (STB served Nov. 4, 2026). In that decision, the Board ordered that "all late-filed notices of intent to participate filed in this proceeding prior to the comment deadline of November 18, 2026, are and will be accepted into the record." *Id.*

Accordingly, the Wyoming Attorney General's Office respectfully requests that the Board accept its notice of intent to participate. The Office of the Wyoming Attorney General consents to email service of all documents, and requests that the undersigned individuals be added to the service list for this proceeding.

Respectfully submitted,

*/s/ Ethan Paddison*
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Dated: November 13, 2026

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused the foregoing document to be served electronically or by first-class mail, postage pre-paid, on the Secretary of Transportation, the Attorney General of the United States, Union Pacific's representative, Norfolk Southern's representative, Administrative Law Judge Jenifer Soulikias, and all parties of record in this proceeding.

*/s/ Ethan Paddison*
Ethan Paddison
Assistant Attorney General
Wyoming Attorney General's Office
November 13, 2026