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CONKLIN, BURGHART & CROW, L.L.C.  
ATTORNEYS AT LAW

#E1-18912  
AB 1088X  
Dew

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May 23, 2012

Vicki Rutson, Director  
Office of Environmental Analysis (OEA)  
U.S. Surface Transportation Board  
395 E. Street, S.W.  
Washington, D.C. 20423-0001

Re: *Jackson, Gordonville and Delta Railroad Company – Abandonment Exemption –  
Line In Cape Girardeau County, Missouri, STB Docket No. AB-1088X*

Dear Director Rutson:

On May 14, 2012, the Jackson, Gordonville and Delta Railroad Company ("JGD Railroad") filed a Notice of Exemption in the above-referenced docket. Attached to the Exemption Notice as Exhibit D was the final draft of the Combined Environmental and Historic Report. (CEHR).

As you may recall, I serve as legal counsel for JGD Railroad. Subsequent to filing the Exemption Notice, I have received two written comments concerning the CEHR, and I have enclosed those comments for your review.

Although the first enclosure is a letter addressed to you by the County Commission of Cape Girardeau County, Missouri, I wanted to make sure you are aware of it. In that letter, the Cape Girardeau County Commission stated that it did not "find any reason to impede the abandonment of the Jackson, Gordonville and Delta Railroad Company."

The second enclosure is a copy of an e-mail I received from Simon Monroe with the National Geodetic Survey. Mr. Monroe's e-mail has relevance to the response to Section 1105.8(d)(1) of the CEHR as it appears on page 14. The first full paragraph on that page includes the substance of Mr. Monroe's e-mail. Apparently Mr. Monroe forgot that he sent me an identical e-mail on April 4, 2012 and I included the substance of the earlier email in my response.

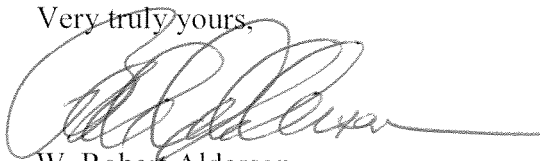
Further, the next paragraph in the CEHR addresses Mr. Monroe's e-mail, reciting the fact that JGD Railroad engaged a professional land surveyor to determine the location of the geodetic survey marks that

Vicki Rutson, Director  
Page 2 of 2  
May 23, 2012

Mr. Monroe has identified as being in proximity to JGD Railroad's rail line. That paragraph states that the surveyor could not identify any of the geodetic survey marks, and this information was related to Mr. Monroe in my e-mail to him of May 7, 2012. As noted in the last sentence of the referenced paragraph, Mr. Monroe acknowledged receipt of that information with his e-mail of May 8, 2012. As Mr. Monroe stated in that e-mail, "[y]ou are to only notify NGS if you find a survey mark. Otherwise, have at it." Since the professional land surveyor was unable to locate any of the survey marks, I do not think that salvage operations following the STB's approval of the Line's abandonment should be impacted.

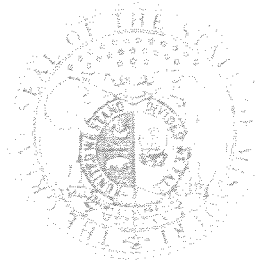
Please let me know if you have any questions regarding this letter or its enclosures.

Very truly yours,

A handwritten signature in black ink, appearing to read "W. Robert Alderson", with a long horizontal flourish extending to the right.

W. Robert Alderson  
ALDERSON, ALDERSON, WEILER,  
CONKLIN, BURGHART & CROW, LLC  
Attorney for Jackson, Gordonville and  
Delta Railroad Company

WRA:cmr  
Enclosures  
cc: Robert L. Adams



RECEIVED

MAY 23 2012

ALDERSON, ALDERSON, WEILER  
CONKLIN, BURGHART & CROW, L.L.C.  
Kara Clark Summers  
Clerk of Commission

Vicki Ivy  
Administrative Assistant

Clint D. Tracy  
Presiding Commissioner

Paul E. Koeper  
1<sup>st</sup> District Commissioner

Jay C. Purcell  
2<sup>nd</sup> District Commissioner

**COUNTY COMMISSION**  
**Cape Girardeau County, Missouri**

# 1 Barton Square  
Jackson, Missouri 63755  
(573) 243-1052  
Fax#: (573) 204-2493

May 17, 2012

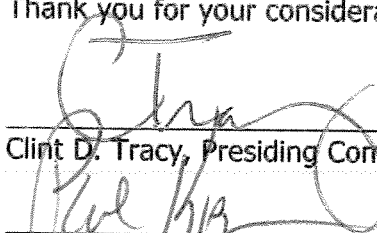
Vicki Rutson, Director  
Office of Environmental Analysis (OEA)  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423-0001

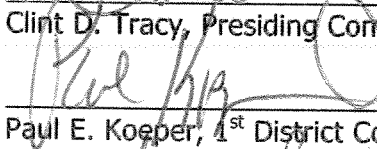
Re: *Jackson, Gordonville and Delta Railroad Company - Abandonment Exemption – Line in Cape Girardeau County, Missouri, STB Docket No. AB-1088X*

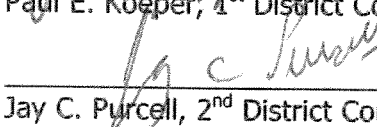
Dear Ms. Rutson:

The Cape Girardeau County Archive Center has reviewed the Environmental and Historical Report describing the proposed abandonment and any expected environmental and historic effects. We do not find any reason to impede the abandonment of the *Jackson, Gordonville and Delta Railroad Company*.

Thank you for your consideration.

  
\_\_\_\_\_  
Clint D. Tracy, Presiding Commissioner

  
\_\_\_\_\_  
Paul E. Koeper, 1<sup>st</sup> District Commissioner

  
\_\_\_\_\_  
Jay C. Purcell, 2<sup>nd</sup> District Commissioner

Attest:

  
\_\_\_\_\_  
Kara Clark Summers, County Commission Clerk

Cc. W. Robert Alderson

## Bob Alderson

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**From:** Simon Monroe [simon.monroe@noaa.gov]  
**Sent:** Tuesday, May 22, 2012 1:48 PM  
**To:** Bob Alderson  
**Cc:** Surface Transportation Board; Gilbert Mitchell; Simon Monroe  
**Subject:** NGS Response, STB Docket AB-1088X

> Thank you for sharing your railroad abandonment environmental report  
> for  
>  
> GORDONVILLE, Cape Girardeau County, MISSOURI.  
>  
>  
>  
> Approximately 02 geodetic survey marks may be located in the area  
> described.  
> If marks will be disturbed by the abandonment, [THE RAILROAD] shall  
> consult with the National Geodetic Survey (NGS) at least 90 days prior  
> to beginning salvage activities that will disturb, or destroy any  
> geodetic station  
>  
> marks described on the attached file. Additional advice is provided  
> at <http://geodesy.noaa.gov/marks/railroads/>

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|....|HB0974|. 2|88/ADJUSTED|N371143.....|W0894408.....|C...|N|N 141  
|....|HB0996|. 1|88/ADJUSTED|N371142.17...|W0894409.53...|D...|N|PTS F 4