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TELEPHONE (312) 236-0204
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mcfarland@aol.com

THOMAS F. MCFARLAND

July 10, 2006

By e-mail

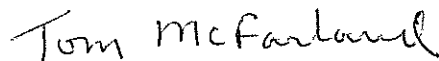
Vernon A. Williams, Secretary
Surface Transportation Board
Case Control Unit, Suite 713
1925 K Street, N.W.
Washington, DC 20423-0001

Re: STB Docket No. 497 (Sub-No. 3X), (Sub-No. 3X), *Minnesota Northern
Railroad, Inc. -- Abandonment Exemption -- in Polk and Norman Counties, MN*

Dear Mr. Williams:

Hereby transmitted is a Draft Environmental and Historic Report in the above
proceedings, which is being sent to appropriate agencies on this date.

Very truly yours,



Thomas F. McFarland
*Attorney for Minnesota Northern
Railroad, Inc.*

TMcF:kl:enc:1170\trstb1

cc: Ms. Victoria Rutson, *by overnight mail*
Mr. George LaPray, *by e-mail*

BEFORE THE
SURFACE TRANSPORTATION BOARD

MINNESOTA NORTHERN RAILROAD, INC. --)
ABANDONMENT EXEMPTION --) DOCKET No.
IN POLK AND NORMAN COUNTIES, MN) AB-497 (Sub-No. 3X)

DRAFT ENVIRONMENTAL AND HISTORIC REPORT

MINNESOTA NORTHERN RAILROAD, INC.
P.O. Box 705
Crookston, MN 56716

Petitioner

THOMAS F. McFARLAND
THOMAS F. McFARLAND, P.C.
208 South LaSalle Street, Suite 1890
Chicago, IL 60604-1112
(312) 236-0204

Attorney for Petitioner

Date Submitted: July 10, 2006

BEFORE THE
SURFACE TRANSPORTATION BOARD

MINNESOTA NORTHERN RAILROAD, INC. --	)	
ABANDONMENT EXEMPTION --	)	DOCKET No.
IN POLK AND NORMAN COUNTIES, MN	)	AB-497 (Sub-No. 3X)

DRAFT ENVIRONMENTAL AND HISTORIC REPORT

Pursuant to 49 C.F.R. § 1105.7 and 1105.8, MINNESOTA NORTHERN RAILROAD, INC., (MNN) hereby files this Draft Environmental and Historic Report.

I. Environmental Report

MNN hereby submits the following information required by 49 C.F.R. § 1105.7(e):

(1) Proposed action and alternatives. Describe the proposed action, including commodities transported, the planned disposition (if any) of any rail line and other structures that may be involved, and any possible changes in current operations or maintenance practices. Also describe any reasonable alternatives to the proposed action. Include a readable, detailed map and drawings clearly delineating the project.

MNN proposes to file a Petition under 49 U.S.C. § 10502(a) for an exemption from 49 U.S.C. § 10903 for abandonment of a portion of its Ada Subdivision between milepost No. 64.0 south of Beltrami and end of track at milepost No. 47.0 south of Ada, a distance of 17.0 miles in Polk and Norman Counties, Minnesota (the Rail Line).

MNN has used the Rail Line to transport oats, barley, edible beans, and fertilizer to and from customers located at and near Ada, MN.

If the requested exemption is granted and becomes effective, MNN will remove and/or reuse the track materials on the Rail Line. MNN would sell or make a non-rail use of the land in the right-of-way of the Rail Line.

The Rail Line was embargoed effective April 3, 2006 due to unsafe track conditions resulting from flooding. Rail operations ceased at that time. Track maintenance since that time has been minimal. Rail operations and track maintenance would cease permanently in the event that the proposed exemption were to be granted and exercised.

There is no reasonable alternative to the proposed exemption because losses from operating the line and the expenditure required to repair washouts caused by recent flooding would be unduly burdensome without the exemption.

A map of the involved rail line is attached to this Report as Appendix 1.

(2) Transportation system. Describe the effects of the proposed action on regional or local transportation systems and patterns. Estimate the amount of traffic (passenger or freight) that will be diverted to other transportation systems or modes as a result of the proposed action.

MNN believes that the proposed exemption will have a minimal effect on regional or local transportation systems and patterns. Only 86 carloads of freight moved over the rail line in 2005. At roughly four trucks per rail carload, that would equate to 344 truck shipments in a one-year period, or an average of less than one additional truck per day on the regional highway system. Minnesota Highways 9 and 200, which converge at Ada, are in adequate condition to accommodate that minimal increase in truck traffic.

(3) Land use. (i) Based on consultation with local and/or regional planning agencies and/or a review of the official planning documents prepared by such agencies, state whether the proposed action is consistent with existing land use plans. Describe any inconsistencies.

MNN believes that the proposed exemption will not be inconsistent with local or regional land use plans. Based on MNN's experience in the area, there is little possibility that businesses desiring rail service will locate along the Rail Line. Shippers currently using the Rail Line can easily reroute their traffic via truck or rail-truck service. In accordance with the requirements of this regulation, MNN has consulted by letter with the planning agencies of the City of Ada, MN and Norman and Polk Counties, MN. See letter attached as Appendix 2. Attached to this Report as Appendix 5 is a copy of a comment from Polk County, Minnesota, dated June 28, 2006, stating that the proposed abandonment would be consistent with Polk County's land use plans.

(3) (ii) *Based on consultation with the U.S. Soil Conservation Service, state the effect of the proposed action on any prime agricultural land.*

MNN does not believe that the proposed exemption would have any effect on prime agricultural land. The Rail Line is adjacent to agricultural land but is not itself agricultural land. Therefore, removal of trackage from the Rail Line should not have any effect on prime agricultural land. In accordance with this regulation, MNN has consulted by letter with the Natural Resources Conservation Service, formerly known as the U.S. Soil Conservation Service (Appendix 2 hereto). Any response will be furnished to the Board's environmental section.

(3) (iii) *If the action affects land or water uses within a designated coastal zone, include the coastal zone information required by Sec. 1105.9.*

The proposed exemption does not affect land or water uses in a designated coastal zone.

(3) (iv) *If the proposed action is an abandonment, state whether or not the right-of-way is suitable for alternative public use under 49 U.S.C. 10906 and explain why.*

In MNN's opinion, the right-of-way would not be suitable for alternative public use as a highway because there are adequate highways in the area. The right-of-way may be suitable for alternative public use as a recreational trail.

(4) Energy. (i) Describe the effect of the proposed action on transportation of energy resources.

The proposed exemption will have no effect on transportation of energy resources.

(4) (ii) Describe the effect of the proposed action on recyclable commodities.

The proposed exemption will have no effect on recyclable commodities.

(4) (iii) State whether the proposed action will result in an increase or decrease in overall energy efficiency and explain why.

The proposed exemption will result in a decrease in overall energy efficiency because rail transportation is more energy efficient than truck transportation. However, the decrease will be minimal. See response to item 2 above.

(4) (iv) If the proposed action will cause diversions from rail to motor carriage of more than: (A) 1,000 rail carloads a year; or (B) An average of 50 rail carloads per mile per year for any part of the affected line, quantify the resulting net change in energy consumption and show data and methodology used to arrive at the figure given. To minimize the production of repetitive data, the information on overall energy efficiency in Sec. 1105.7(e)(4)(iii) need not be supplied if the more detailed information in Sec. 1105.7(e)(4)(iv) is required.

Not applicable

(5) Air. (i) If the proposed action will result in either: (A) An increase in rail traffic of at least 100 percent (measured in gross tons miles annually) or an increase of at least eight trains a day on any segment of rail line affected by the proposal, or (B) An increase in rail yard activity of at least 100 percent (measured by car load activity), or (C) An average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on any affected road segment, quantify the anticipated effect on air emissions. For a proposal under 49 U.S.C. 10901 (or 10505) to construct a new line or reinstitute service over a previously abandoned line, only the eight train a day provision in subsection (5)(i)(A) will apply.

Not applicable

(5) (ii) *If the proposed action affects a class I or nonattainment area under the Clean Air Act, and will result in either: (A) An increase in rail traffic of at least 50 percent (measured in gross tons miles annually) or an increase of at least three trains a day on any segment of the rail line, (B) An increase in rail yard activity of at least 20 percent (measured by carload activity), or (C) An average increase in truck traffic of more than 10 per cent of the average daily traffic of 50 vehicles a day on a given road segment, then state whether any expected increased emissions are within the parameters established by the State Implementation Plan. However, for a rail construction under 49 U.S.C. 10901 (or 49 U.S.C. 10505), or a case involving the reinstitution of service over a previously abandoned line, only the three train a day threshold in this item shall apply.*

Not applicable

(5) (iii) *If transportation of ozone depleting materials (such as nitrogen oxide and freon) is contemplated, identify: the materials and quantity; the frequency of service; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and spills; contingency plans to deal with accidental spills; and the likelihood of an accidental release of ozone depleting materials in the event of a collision or derailment.*

Not applicable

(6) *Noise. If any of the thresholds identified in item (5)(i) of this section are surpassed, state whether the proposed action will cause: (i) An incremental increase in noise levels of three decibels Ldn or more;*

Not applicable

(6) (ii) *An increase to a noise level of 65 decibels Ldn or greater. If so, identify sensitive receptors (e.g. schools, libraries, hospitals, residences, retirement communities, and nursing homes) in the project area, and quantify the noise increase for these receptors if the thresholds are surpassed.*

Not applicable

(7) *Safety. (i) Describe any effects of the proposed action on public health and safety (including vehicle delay time at railroad grade crossings).*

The proposed exemption will have a beneficial effect on public health and safety.

Discontinuance of rail operations over the Rail Line will result in the closing and

elimination of several public at-grade road crossings along the line. That will reduce vehicle delay time and potential for rail-motor vehicle accidents in the area.

(7) (ii) *If hazardous materials are expected to be transported, identify: the materials and quantity; the frequency of service; whether chemicals are being transported that, if mixed, could react to form more hazardous compounds; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and hazardous spills; the contingency plans to deal with accidental spills; and the likelihood of an accident release of hazardous materials.*

Not applicable

(7) (iii) *If there are any known hazardous waste sites or sites where there have been known hazardous materials spills on the right-of-way, identify the location of those sites and types of hazardous materials involved.*

Not applicable

(8) *Biological resources. (i) Based on consultation with the U.S. Fish and Wildlife Service, state whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat, and if so, describe the effects.*

MNN does not believe that it is likely that the proposed exemption would adversely affect endangered or threatened species or areas designated as critical habitat. In accordance with this regulation, MNN has consulted by letter with the U.S. Fish and Wildlife Service (Appendix 2). Attached to this Report as Appendix 6 is a copy of a comment from the U.S. Fish & Wildlife Service dated June 29, 2006 expressing no concern with the proposed abandonment.

(8) (ii) *State whether wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.*

MNN does not believe that the proposed exemption would affect wildlife sanctuaries or refuges, nor National or state parks or forests.

(9) Water. (i) Based on consultation with State water quality officials, state whether the proposed action is consistent with applicable Federal, State or local water quality standards. Describe any inconsistencies.

MNN believes that the proposed exemption will be consistent with applicable Federal, State or local water quality standards. In accordance with this regulation, MNN has consulted by letter with Minnesota water quality officials (Appendix 2). Any response will be furnished to the Board's environmental section.

(9) (ii) Based on consultation with the U.S. Army Corps of Engineers, state whether permits under section 404 of the Clean Water Act (33 U.S.C. 1344) are required for the proposed action and whether designated wetlands or 100-year flood plains will be affected. Describe the effects.

MNN believes that permits under section 404 of the Clean Water Act are not required for the proposed exemption. MNN does not believe that the proposed exemption will affect any designated wetlands or 100-year flood plains. In accordance with this regulation, MNN has consulted by letter with the U.S. Army Corps of Engineers (Appendix 2). Any response will be furnished to the Board's environmental section.

(9) (iii) State whether permits under section 402 of the Clean Water Act (33 U.S.C. 1342) are required for the proposed action. (Applicants should contact the U.S. Environmental Protection Agency or the state environmental protection or equivalent agency if they are unsure whether such permits are required.)

MNN believes that permits under section 402 of the Clean Water Act are not required for the proposed exemption. In accordance with this regulation, MNN has consulted by letter with the U.S. Environmental Protection Agency (Appendix 2). Any response will be furnished to the Board's environmental section.

(10) Proposed Mitigation. Describe any actions that are proposed to mitigate adverse environmental impacts, indicating why the proposed mitigation is appropriate.

Not applicable

II. Historic Report

MNN hereby submits the following information required by 49 C.F.R. §

1105.8(d):

(1) A U.S.G.S. topographic map (or an alternate map drawn to scale and sufficiently detailed to show buildings and other structures in the vicinity of the proposed action) showing the location of the proposed action, and the locations and approximate dimensions of railroad structures that are 50 years old or older are part of the proposed action;

The required topographic map is attached to this Report as Appendix 3.

(2) A written description of the right-of-way (including approximate widths, to the extent known), and the topography and urban and/or rural characteristics of the surrounding area;

The right-of-way to be abandoned is generally 100 feet wide, except that it is generally 50 feet wide through town sites, and 17 miles long. It extends generally through rural, slightly rolling terrain.

(3) Good quality photographs (actual photographic prints, not photocopies) of railroad structures on the property that are 50 years old or older and of the immediately surrounding area;

Attached to this Report as Appendix 4 are photographs of the bridges on the Rail Line.

(4) The date(s) of construction of the structure(s), and the date(s) and extent of any major alterations, to the extent such information is known;

Not known, except that the bridges are thought to be more than 50 years old.

(5) A brief narrative story of carrier operations in the area, and an explanation of what, if any, changes are contemplated as a result of the proposed action;

The Rail Line was originally a part of a line of the Great Northern Railway between the Canadian border near Noyes, MN and Minneapolis, MN. The Rail Line came under the ownership of BNSF Railway Company through a series of mergers. It was acquired by MNN in 1997.

(6) A brief summary of documents in the carrier's possession, such as engineering drawings, that might be useful in documenting a structure that is found to be historic.

No such documents are in MNN's possession.

(7) An opinion (based on readily available information in the railroad's possession) as to whether the site and/or structures meet the criteria for listing on the National Register of Historic Places (36 CFR 60.4), and whether there is a likelihood of archeological resources or any other previously unknown historic properties in the project area, and the basis for these opinions (including any consultations with the State Historic preservation Office, local historical societies or universities);

It is MNN's opinion that the bridges on the Rail Line do not meet the criteria for listing on the National Register of Historical Places, and that there is no likelihood of archeological resources or any other previously unknown historic properties in the project area. In accordance with this regulation, MNN has consulted by letter with the Minnesota Historic Preservation Office (Appendix 2). Any response will be furnished to the Board's environmental section.

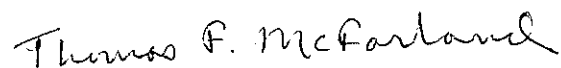
(8) A description (based on readily available information in the railroad's possession) of any known prior subsurface ground disturbance or fill, environmental conditions (naturally occurring or manmade) that might affect the archeological recovery of resources (such as swampy conditions or the presence of toxic wastes), and the surrounding terrain.

MNN has no knowledge of any prior subsurface ground disturbance or fill, or environmental conditions that might affect the archeological recovery of resources and the surrounding terrain.

Respectfully submitted,

MINNESOTA NORTHERN RAILROAD, INC.
P.O. Box 705
Crookston, MN 56716

Petitioner

A handwritten signature in cursive script that reads "Thomas F. McFarland".

THOMAS F. McFARLAND
THOMAS F. McFARLAND, P.C.
208 South LaSalle Street, Suite 1890
Chicago, IL 60604-1112
(312) 236-0204

Attorney for Petitioner

Dated Submitted: July 10, 2006

APPENDIX 1

TOPOI map printed on 12/23/04 from "Untitled.tpo"



4°

APPENDIX 2

LAW OFFICE
THOMAS F. MCFARLAND, P.C.
208 SOUTH LASALLE STREET - SUITE 1890
CHICAGO, ILLINOIS 60604-1112
TELEPHONE (312) 236-0204
FAX (312) 201-9695
mcfarland@aol.com

THOMAS F. MCFARLAND

June 19, 2006

Natural Resources Conservation Service:

375 Jackson Street, Room 600
St. Paul, MN 55101-1854

Minnesota Historical Preservation Office:

Minnesota Historical Society
345 Kellogg Blvd. West
St. Paul, MN 55102-1906

US Fish & Wildlife Service – Region 3:

One Federal Drive
BHW Federal Building
Fort Snelling
Twin Cities, MN 55111

Minnesota State Clearinghouse:

c/o Minnesota Department of Administration
200 Administration Building
50 Sherburne Avenue
St. Paul, MN 55155

County Commissioners:

(for County Planner)
Norman County
16 Third Ave., East
Ada, MN 56510

Minnesota Pollution Control Agency:

520 Lafayette Road
St. Paul, MN 55155-4194

Minnesota Department of Transportation:

Transportation Building
395 John Ireland Blvd.
St. Paul, MN 55155

US Army Corps of Engineers:

190 Fifth Street East
St. Paul, MN 55101-1638

US Environmental Protection Agency

Region 5:
77 West Jackson Blvd.
Chicago, IL 60604-3590

National Oceanic & Atmospheric Admin.:

National Geodetic Survey
1315 East-West Highway
Silver Springs, MD 20910-3282

Ms. Shelley Kappes:

City Clerk (for City Planner)
City of Ada
P.O. Box 32
Ada, MN 56510

County Commissioners:

(for County Planners)
Polk County
612 North Broadway
Crookston, MN 56716

Mr. William D. Shaddox:

National Park Service, Land Resources Dir.
1849 C Street, N.W. # MS 3540
Washington, DC 20240

Re: Surface Transportation Board Docket No. AB – 497 (Sub-No. 3X)
Minnesota Northern Railroad, Inc. - - Abandonment
Exemption - - in Polk and Norman Counties, MN

Dear Agency or Governmental Representative:

June 19, 2006

Page 2

Minnesota Northern Railroad, Inc. (MNN) plans to file a Petition with the Surface Transportation Board (STB) in the near future for an exemption permitting abandonment of a portion of its Ada Subdivision between milepost No. 64.0 near Beltrami and milepost No. 47.0 (end of track) south of Ada, a distance of 17.0 miles in Polk and Norman Counties, Minnesota ("the Rail Line"). The Rail Line is shaded in pink on a map that is attached to this letter as Appendix 1.

Pursuant to STB regulations at 49 CFR 1105.7, this letter is to request your assistance in identifying potential environmental and historic effects of the proposed abandonment. MNN does not anticipate any adverse environmental or historic impacts; however, if you identify any such adverse impacts, please describe any action that could be taken to mitigate such adverse impacts. Please provide a written response to this letter so that it can be included in a Draft Environmental and Historic Report that MNN will prepare and file with the STB.

COUNTY AND CITY PLANNING AGENCIES. Please state whether the proposed abandonment would be consistent with existing land-use plans. Describe any inconsistencies.

US SOIL CONSERVATION SERVICE. Please state the effect of the proposed abandonment on any prime agricultural land.

June 19, 2006

Page 3

US FISH AND WILDLIFE SERVICE. Please state (1) whether the proposed abandonment is likely to adversely affect endangered or threatened species or areas designated as a critical habitat and, if so, please describe such effects; and (2) whether wildlife sanctuaries or refuges, National or State parks or forests will be affected and, if so, please describe such effects.

STATE WATER QUALITY OFFICIALS. Please state whether the proposed abandonment would be consistent with applicable Federal, State or Local water quality standards. Please describe any inconsistencies.

US ARMY CORPS OF ENGINEERS. Please state (1) whether permits under Section 404 of the Clean Water Act (33 USC 1344) are required for the proposed abandonment, and (2) whether any designated wetlands or 100-year flood plains would be affected by the proposed abandonment. Please describe any such effects.

US AND STATE ENVIRONMENTAL PROTECTION AGENCIES (OR EQUIVALENT AGENCY). Please (1) identify any potential adverse environmental effects of the proposed abandonment on the surrounding area, and (2) identify the location of any known hazardous materials spills on the right-of-way of the Rail Line, and list the types of hazardous materials involved, and (3) state whether permits under

June 19, 2006
Page 4

Section 402 of the Clean Water Act (33 USC 1342) are required for the proposed abandonment.

STATE HISTORICAL PRESERVATION OFFICE. Please identify any known bridges and/or other structures located on the Rail Line that are 50 years old or older, and which are historically significant. Please state whether the proposed abandonment would have an adverse effect on such bridges and /or structures and, if so, please describe efforts that can be taken during removal of the tracks in the Rail Line to mitigate any such adverse effects.

Please send your reply to me as MNN's attorney to: Thomas F. McFarland, 208 South LaSalle Street, suite 1890, Chicago, IL 60604. You may reach me by telephone at (312) 236-0204 if you have any questions or need further information. MNN appreciates your assistance in furnishing a reply to this letter.

Sincerely

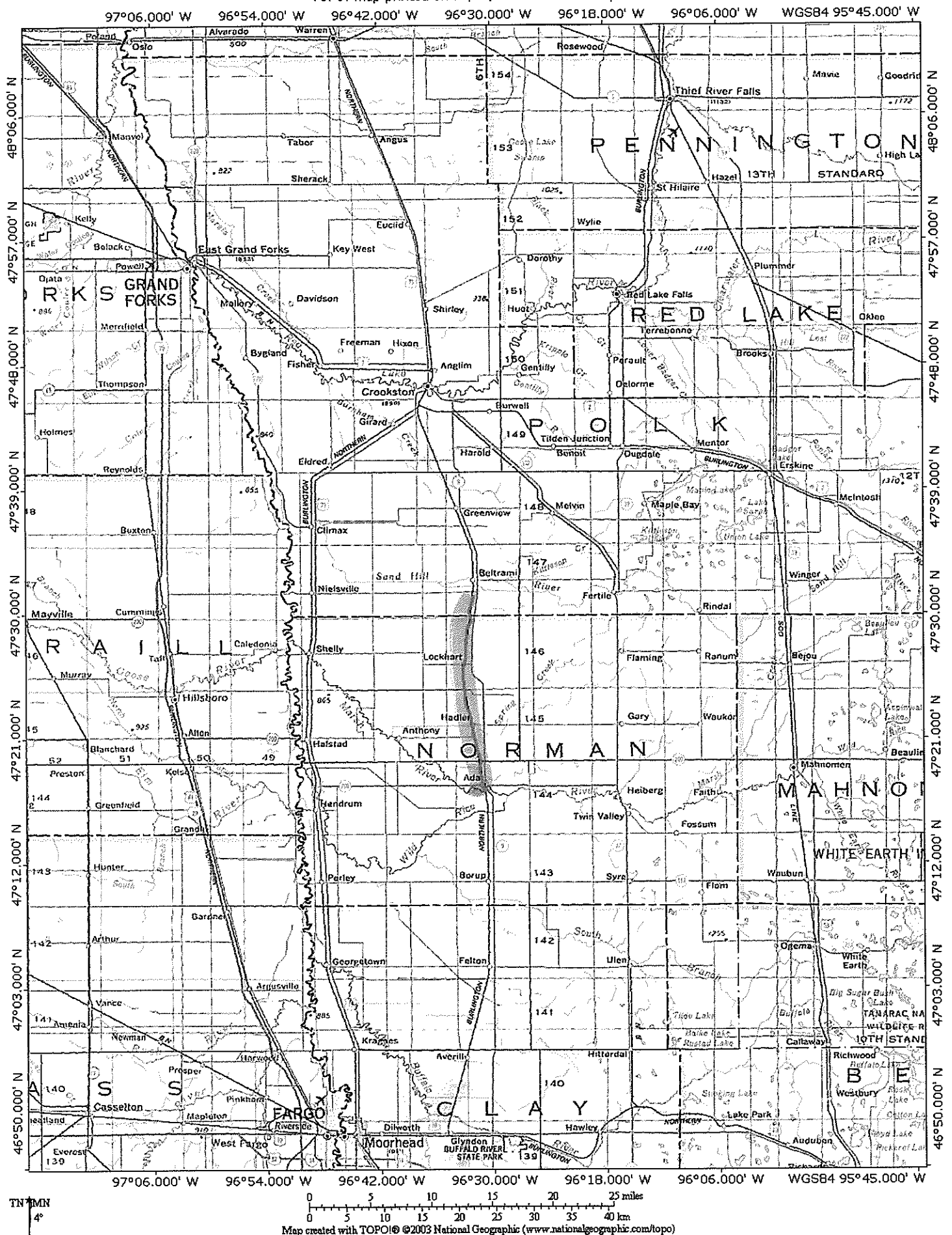
A handwritten signature in black ink that reads "Tom McFarland". The signature is written in a cursive, slightly slanted style.

Thomas F. McFarland
Attorney for Minnesota
Northern Railroad, Inc.

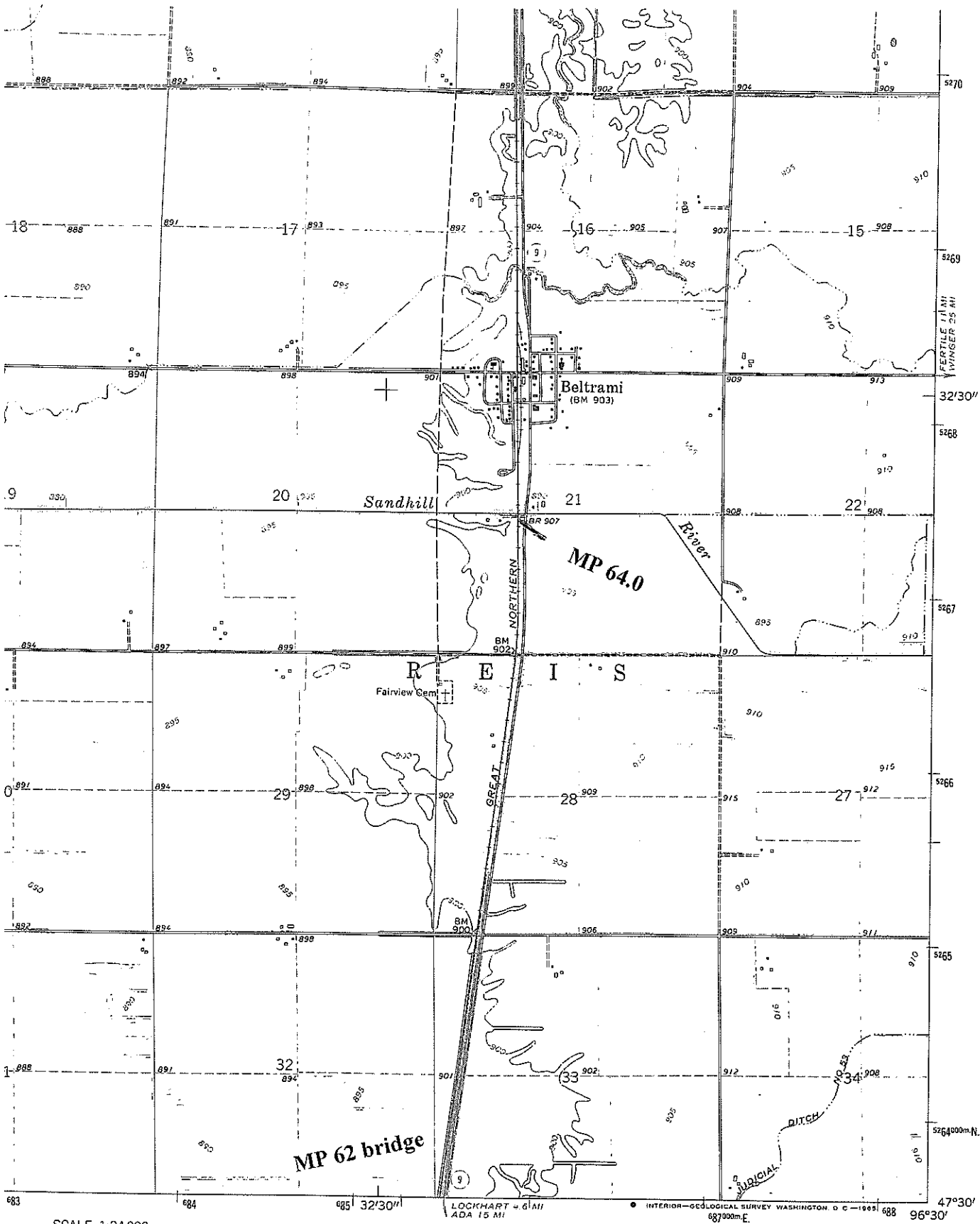
1169

cc Mr. George LaPray

TOPOI map printed on 12/23/04 from "Untitled.tpo"



APPENDIX 3



SCALE 1:24,000



CONTOUR INTERVAL 5 FEET
DATUM IS MEAN SEA LEVEL



ROAD CLASSIFICATION

Medium-duty ——— Light-duty ———
Unimproved dirt ———
○ State Route

BELTRAMI, MINN.
N4730—W9630/7.5

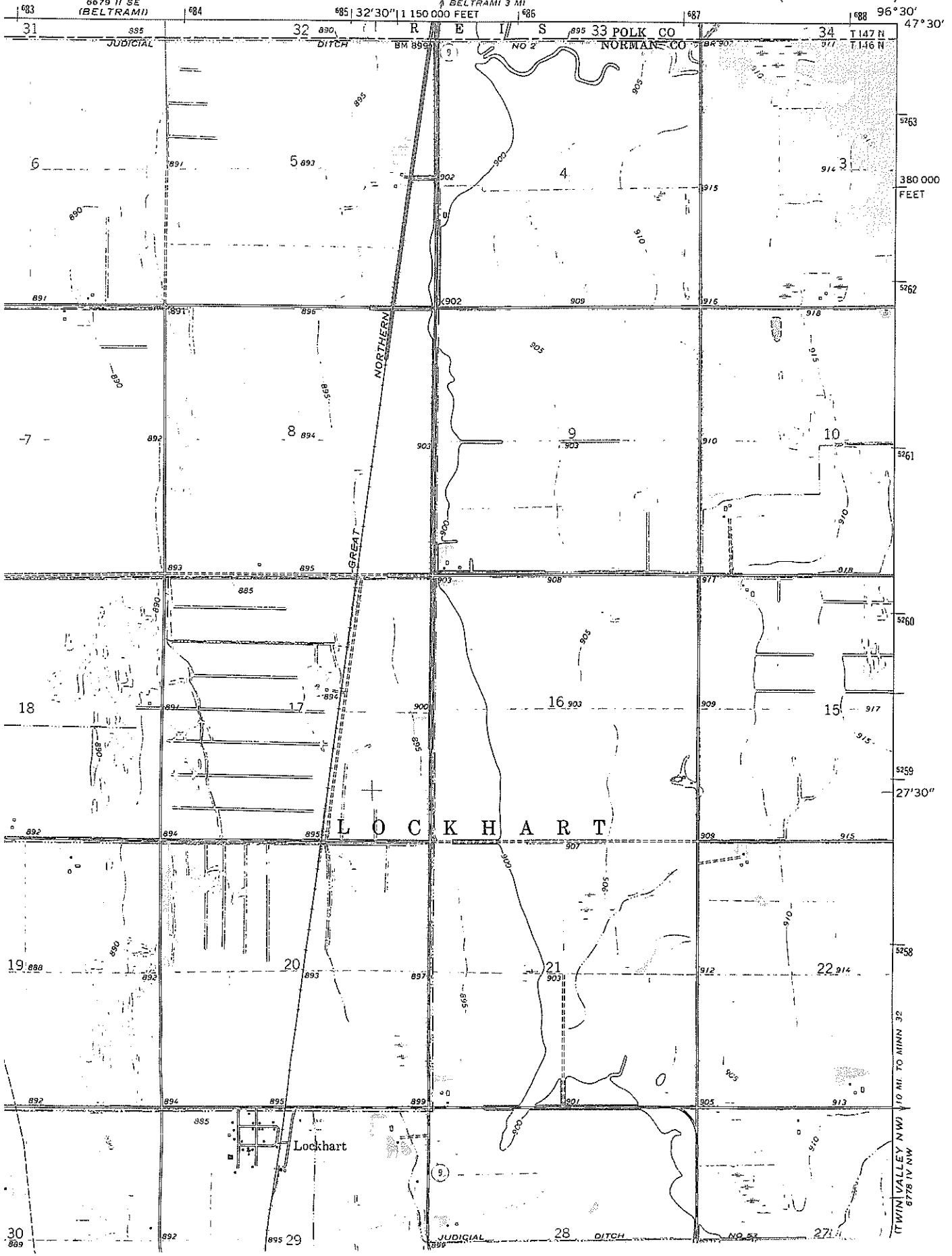
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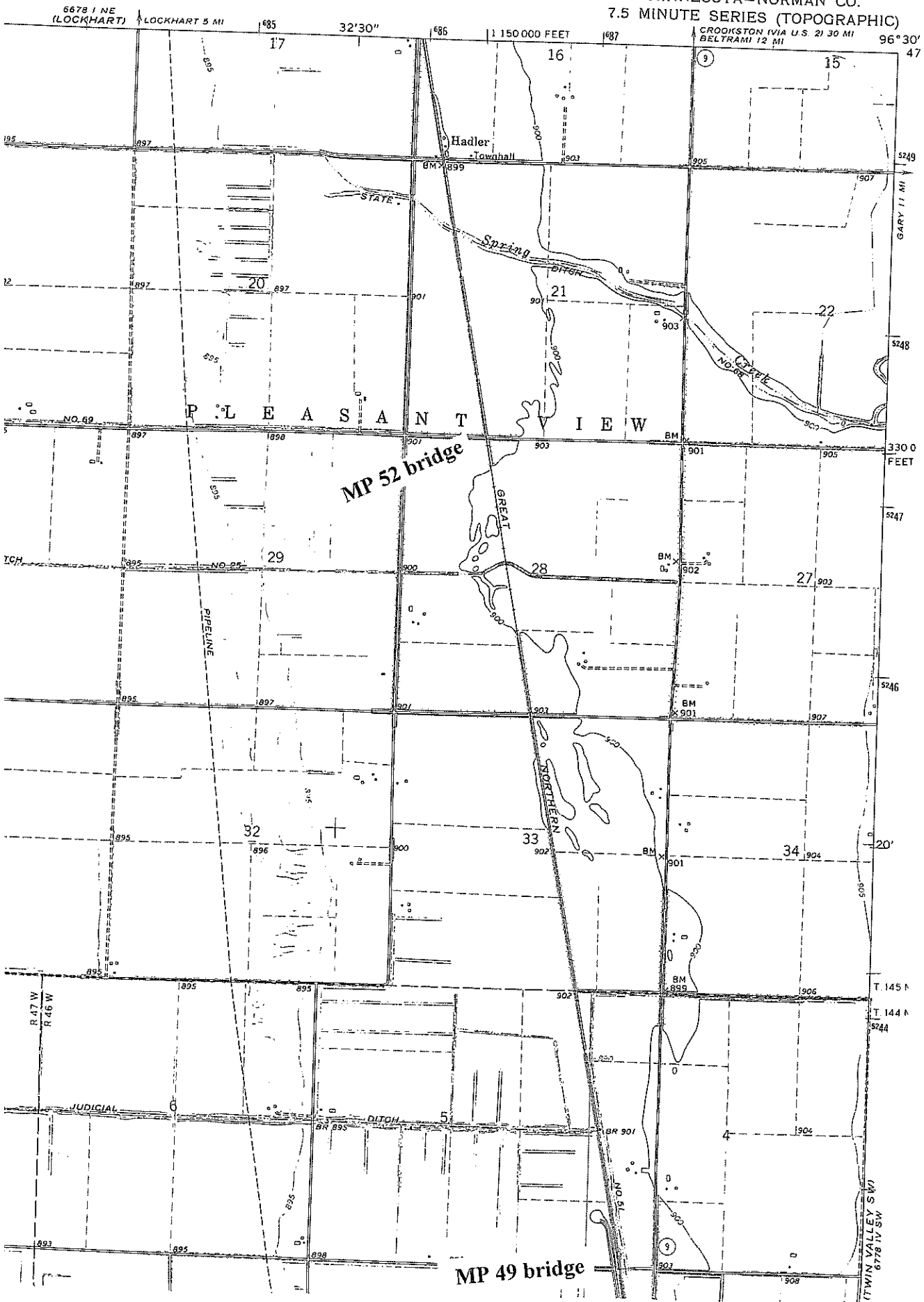
STATE OF MINNESOTA
DEPARTMENT OF ADMINISTRATION

LOCKHART QUADRANGLE
MINNESOTA

CROOKSTON (VIA U.S. 2) 21 MI. 7.5 MINUTE SERIES (TOPOGRAPHIC)

6779 N SW
MELVIN







SCALE 1:24000



CONTOUR INTERVAL 5 FEET
DATUM IS MEAN SEA LEVEL



QUADRANGLE LOCATION

ROAD CLASSIFICATION

- Heavy-duty —————
- Medium-duty —————
- Light-duty —————
- Unimproved dirt —————
- State Route

ADA, MINN.
N4715—W9630/7.5

1965

APPENDIX 4



MP 47



MP 49



MP 52



MP 54



MP 55



MP 56



MP 62



POLK COUNTY

ENVIRONMENTAL SERVICES

Waste Management/ Planning and Zoning

RECEIVED

JUL 03 2006

McFarland, P.C.

APPENDIX 5

Post Office Box 375
320 Ingersoll
Crookston, MN 56716
(218) 281-6445
(218) 281-5700
(218) 281-6471 FAX
1-800-482-6804
environmental.svs@co.polk.mn.us

Printed on recycled paper

June 28, 2006

Thomas F. McFarland, PC
MNN Railroad Representative
208 S. LaSalle Street – Suite 1890
Chicago, IL 60604-1112

RE: proposed abandonment of railroad track in Polk Co.

To whom it may concern:

Polk County has received a letter from Mr. McFarland in regards to the proposal from Minnesota Northern Railroad for the abandonment of railroad track in Southern Polk County. The letter requests comment from the County Planning Office as to the environmental and historic impacts the abandonment would have on the area and whether the proposed abandonment would be consistent with existing land-use plans. Therefore, I am sending a response to this letter.

The abandonment of this track is consistent with our land-use plans and Comprehensive Plan. The Polk County Comprehensive Plan states as a Transportation Goal to “support the maintenance and safe use of the remaining railroad system and maintain abandoned railroad right of way intact where feasible”. Also, the abandonment of track does not require any special permits, approval or hearings. Therefore, the Polk County Planning and Zoning Office does not see any adverse environmental or historic impacts in terms of land use planning.

If you have any questions regarding this letter, you may contact me at 1-800-482-6804 or (218) 281-5700. I hope that this letter meets the need of the MNN petition to abandon.

Sincerely,

Nancy Ellis

Polk Co. Planning and Zoning Administrator
nancy.ellis@co.polk.mn.us



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Bishop Henry Whipple Federal Building
1 Federal Drive
Fort Snelling, MN 55111-4056

RECEIVED

JUL 03 2006

McFarland, PC.

IN REPLY REFER TO:

FWS/NWRS-RE - General
Railroad Abandonments

June 29, 2006

Mr. Thomas F. McFarland, PC
208 South LaSalle Street
Suite 1890
Chicago, Illinois 60604-1112

Dear Mr. McFarland:

Thank you for the opportunity to comment on the proposed abandonment of 17.0 miles of railroad line between milepost No. 64.0 near Beltrami and milepost No. 47.0 south of Ada, in Polk and Norman Counties, Minnesota; STB Docket No. AB-497 (Sub-No. 3X) Minnesota Northern Railroad, Inc.

We have researched our ownerships in the vicinity and have determined we do not own any lands or interests in land in the vicinity of the proposed rail line abandonment. We do not have any concerns regarding real estate matters in the abandonment.

Sincerely,

Patrick G. Carroll
Senior Realty Officer
Division of Realty