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November 13, 2014

By e-mail to kenneth.blodgett@stb.dot.gov

Mr. Ken Blodgett
Office of Environmental Analysis
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

Re: Finance Docket No. 35874, *Lone Star Railroad, Inc. and Southern Switching Company -- Track Construction and Operation Exemption -- in Howard County, TX*

Dear Ken:

Lone Star Railroad, Inc. (LSR), a Class III rail carrier, proposes to construct approximately 9,000 feet of track (approximately 1.7 miles) near Big Spring, Howard County, TX. An affiliate of LSR, Southern Switching Company (SSC), also a Class III rail carrier, proposes to operate on that newly-constructed track. LSR and SSC intend to file a Petition for Exemption from 49 U.S.C. § 10901(a)(1) for LSR's construction of the track, and from 49 U.S.C. § 10902(a) for SSC's operation on that track. LSR and SSC are referred to collectively as Petitioners.

The newly-constructed track would connect with an existing main line track of Union Pacific Railroad Company (UP). The track would serve an industrial park (Big Spring Industrial Park) at which it is likely that initially the principal shippers and receivers would be related to the burgeoning crude-oil production in the nearby Permian Basin (e.g., frac sand, pipe, etc.). However, it is expected that shippers and receivers of commodities unrelated to crude oil production will also locate in the Industrial Park. The new rail line would also enable rail service to be provided to an existing shipper of crude oil and related commodities located adjacent to the Industrial Park on its west.

Pursuant to 49 C.F.R. § 1105.10(a), Petitioner LSR hereby respectfully requests a waiver of the requirement that a person filing a petition for an exemption for track construction consult with the Office of Environmental Analysis (OEA) at least six months prior to filing the Petition for Exemption. Such pre-notification is not needed nor appropriate in regard to LSR's proposed track construction. LSR is continuing to prepare substantial engineering and environmental data

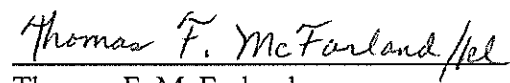
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for presentation to OEA in regard to the proposed track construction. In accordance with Board procedures, an independent third-party consultant to be selected by the Board will prepare environmental documentation in regard to the Project. A delay of six months would jeopardize development of the industrial park in light of the fast-moving demand for crude oil and related commodities in the territory.

WHEREFORE, the six-month pre-notification requirement should be waived.

Respectfully submitted,


Thomas F. McFarland
*Attorney for Petitioners Lone Star
Railroad, Inc. and Southern
Switching Company*

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cc: Ms. Victoria Rutson, vicki.rutson@stb.dot.gov