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September 15, 2020

VIA EMAIL

Vicki Rutson
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, N.W.
Washington, D.C. 20423

RE: STB Docket No. FD 36439, Flint Hill Resources Railroad, LLC – Construction
and Operation Exemption– In Hardin County IA

Dear Ms. Rutson:

In accordance with 49 CFR §1105.10(d), Flint Hill Resources Railroad, LLC (“FHRR”), a subsidiary of Flint Hill Resources, respectfully requests approval of the environmental consulting firm, Burns & McDonnell (“B&M”), to work with the Office of Environmental Analysis (“OEA”) to prepare the necessary environmental documentation associated with FHRR’s proposed construction and operation of a new rail line (“the Line”). The Line will connect Flint Hill Resources Iowa Falls Ethanol Plant (“Plant”) with the Canadian National Railway (“CN”). The Plant is currently exclusively served by the Union Pacific Railroad. FHRR anticipates filing an individual Petition for Exemption under 49 U.S.C. §10901 to permit it to construct and own the Line.¹ B&M has been identified by OEA as an entity that is qualified to serve as a third-party consultant for railroad-related projects.

Pursuant to 49 CFR §1105(d), we expect B&M’s work to be performed under the OEA’s direction, supervision, and control. Further, we expect B&M to undertake this project in accordance with the OEA’s requirements for disclosure and pursuant to a memorandum of understanding to be entered among OEA, B&M, and FHRR.

We can confirm that B&M is not presently engaged in any other projects for FHRR.

Sincerely,

/s/ William A. Mullins

William A. Mullins
Counsel for FHRR

¹ FHRR intends to contract with a third party carrier to conduct the rail operations over the Line or to grant trackage rights to CN to operate over the Line in order to provide rail service to the Plant.