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February 20, 2012

Rachel D. Campbell  
Director, Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W., Suite 1002  
Washington, D.C. 20423-0001

231871

Re: SunBelt Chlor Alkali Partnership v. Norfolk Southern Railway Co. & Union Pacific Railroad Co., STB Docket No. NOR 42130

Dear Ms. Campbell:

On January 27, 2012, Defendant Norfolk Southern Railway Company ("NS") filed a Petition for Subpoena in the above-referenced proceeding. As counsel for NS, we are writing to inform the Board of an inadvertent misstatement in the Certificate of Service for that Petition. Specifically, the Certificate of Service indicated that the Petition was served both on the registered agent for service of process of Occidental Chemical Corporation ("OxyChem") and on the general counsel of OxyChem. We recently learned that this statement was inaccurate, because the general counsel of OxyChem was inadvertently not served with the petition. OxyChem's registered agent was served with the Petition, and therefore OxyChem was not prejudiced by this oversight. (Indeed, the fact that OxyChem had notice of the Petition is conclusively proven by the fact that OxyChem submitted its response to the Petition on February 16.) Nevertheless, we apologize to the Board and the parties for the misstatement.

Sincerely,

G. Paul Moates

cc: Jeffrey O. Moreno (Counsel for SunBelt Chlor Alkali Partnership)  
Thomas W. Wilcox (Counsel for OxyChem)  
Scott A. King (General Counsel, Occidental Chemical Corporation)  
Michael L. Rosenthal (Counsel for Union Pacific Railroad)

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