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Karl Morell
Of Counsel
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E-Filed

Cynthia Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: Finance Docket No. 35742, Clarkdale Arizona Central
Railroad, L.C. -- Trackage Rights Exemption – Drake Cement,
LLC

Dear Ms. Brown:

On July 17, 2013, we filed with the Surface Transportation Board ("Board") a Verified Notice of Exemption pursuant to the provisions of 49 C.F.R. § 1180.2(d)(7) in the above referenced proceeding. At the request of Board staff, we are clarifying that both Clarkdale Arizona Central Railroad, L.C. and Drake Cement, LLC are Class 3 railroads. See STB Finance Docket No. 33353, *Clarkdale Arizona Central Railroad, L.C. – Acquisition and Operation Exemption – Arizona Central Railroad, Inc.* (not printed), served February 28, 1997; and STB Finance Docket No. 35350, *Drake Cement, LLC – Acquisition Exemption – Clarkdale Arizona Central Railroad, LLC* (not printed), served February 18, 2010. Also, the rail line located between milepost 0 + 15 feet and milepost 0 + 3000 feet is 2,985 feet in length.



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If you have any further questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Karl Morell". The signature is written in a cursive, flowing style.

Karl Morell
Of Counsel