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April 16, 2002

Mr. Vernon A. Williams, Secretary  
Surface Transportation Board  
Office of the Secretary  
Case Control Unit  
1925 K St., NW  
Washington, DC 20423-001



Re: Docket AB-33 (Sub-No. 170)  
Abandonment by Union Pacific Railroad Company  
Offer of Financial Assistance by Mid-America Railroad, LLC  
Bell Avenue Industrial Lead, Des Moines, Iowa

Dear Mr. Williams:

Enclosed please find the original and ten (10) copies of a Request for Extension of Time to Negotiate Price in the above-captioned abandonment proceedings.

By my signature below, I certify service upon applicant's representative, at the address set forth below, by facsimile and by U. S. Mail, postage prepaid, first class, this 16th day of April, 2002

Sincerely yours,

*William D. Bartine*

William D. Bartine  
For the Firm

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REGISTERED  
Office of the Secretary

APR 17 2002

Part of  
Public Record

Mr. Vernon A. Williams, Secretary  
April 16, 2002  
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cc: Mack H. Shumate, Jr., Esq.  
Senior General Attorney  
Union Pacific Railroad Company  
Law Department  
101 North Wacker Dr.  
Suite 1920  
Chicago, IL 60606

Enclosures

BEFORE THE  
SURFACE TRANSPORTATION BOARD



\_\_\_\_\_  
Docket No. AB-33 (Sub-No. 170)

UNION PACIFIC RAILROAD COMPANY

—ABANDONMENT AND DISCONTINUATION OF OPERATION—

IN POLK COUNTY, IOWA

(BELL AVENUE INDUSTRIAL LEAD IN DES MOINES, IOWA)

\_\_\_\_\_  
**REQUEST FOR EXTENSION OF TIME**  
**TO NEGOTIATE PRICE**

MID-AMERICA DEVELOPMENT COMPANY

MID-AMERICA RAILROAD COMPANY, L.L.C.

Steven E. Zumbach  
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ATTORNEYS FOR MID-AMERICA  
DEVELOPMENT COMPANY AND  
MID-AMERICA RAILROAD COMPANY, L.L.C.

Dated: April 16, 2002  
Filed: April    , 2002

BEFORE THE  
SURFACE TRANSPORTATION BOARD

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Docket No. AB-33 (Sub-No. 170)  
UNION PACIFIC RAILROAD COMPANY  
—ABANDONMENT AND DISCONTINUATION OF OPERATION—  
IN POLK COUNTY, IOWA  
(BELL AVENUE INDUSTRIAL LEAD IN DES MOINES, IOWA)

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**REQUEST FOR EXTENSION OF TIME**  
**TO NEGOTIATE PRICE**

On March 21, 2002, the Surface Transportation Board issued a decision in the above-captioned matter. In its decision, the Surface Transportation Board found Mid-America Railroad Company, L.L.C. ("MAR") to be a financially responsible party and further found MAR's offer of financial assistance to be reasonable. The Board held that Union Pacific ("UP") and MAR may negotiate a price up until April 22, 2002, when either party may request that the Board establish the terms and conditions of the purchase price.

Unfortunately, it appears UP and MAR will be unable to complete their negotiations by April 22, 2002. Both parties are still desirous of completing such discussions. However, the discussions have been delayed awaiting accurate descriptions and appraisals of the property.

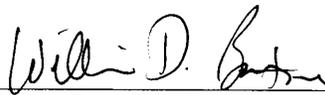
In addition, just today, it came to MAR's attention that Iowa Interstate Railroad Company ("IAIS"), the short-line railroad that has agreed to service the line in question should MAR acquire it, is involved in major litigation which may place the short-line's future viability in jeopardy. MAR's initial inquiries indicate that IAIS will remain viable despite this litigation. However, a two-week extension is necessary to confirm this information.

MAR hereby requests a two-week extension of the time within which to negotiate a purchase price with UP. Therefore, MAR requests that if MAR and UP cannot agree on the

purchase price, either party may petition the Board to establish the terms and conditions of the purchase price by May 6, 2002. Based on MAR's contacts with Mr. Mack Shumate, Senior General Counsel for UP, it is the understanding of the undersigned that the railroad consents and agrees to this request for an extension of time.

By my signature below, I certify service upon Union Pacific by U.S. mail, postage prepaid, first class, this 16 day of April, 2002.

Respectfully submitted,



Steven E. Zumbach  
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