

January 25, 2022

Jennifer L. Hamann
Chief Financial Officer
Union Pacific Corporation
1400 Douglas Street
Omaha, Nebraska 68179

Corporation

Fiscal Year Ended December 31, 2020
2021

Re: Union Pacific

Form 10-K for

Filed February 5,

File No. 001-06075

Dear Ms. Hamann:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance

Office of Energy & Transportation