

KSA INDUSTRIES, INC.

P.O. BOX 844
HOUSTON, TEXAS 77001

December 28, 1992

Office of Employee Benefits Security
Labor-Management Services Administration
U. S. Department of Labor
Washington, D. C. 20216

Re: KSA Industries, Inc./Houston Oilers, Inc.
Deferred Compensation Agreement

Gentlemen:

Pursuant to Regulation 2520.104-23, Dept. of Labor and Part 1 of Title 1 of the Employee Retirement Income Security Act of 1974, KSA Industries, Inc. and the Houston Oilers, Inc. submitted in November of 1977 the following data with respect to the above plan.

Employer: KSA Industries, Inc./Houston Oilers, Inc.
6910 Fannin Street
Houston, Texas 77030

EIN: 74-1056256 KSA Industries, Inc.
74-1361125 Houston Oilers, Inc.

Plan Purpose: To provide deferred compensation to a select group of management employees.

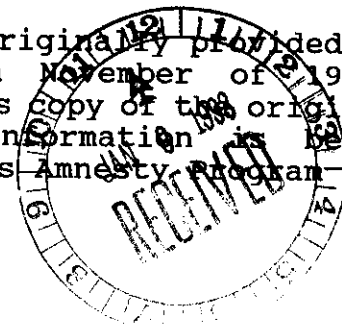
No. of Plans: One

No of Participants: 7

Any plan documents will be furnished on request.

Submitted for and on behalf of the company.

As stated above, the above information was originally provided by the companies to the Department of Labor in November of 1977. Unfortunately, only partial copies of the companies copy of the original submission has been misplaced. The above information is being resubmitted during the U. S. Department of Labor's Amnesty program for late annual reports.

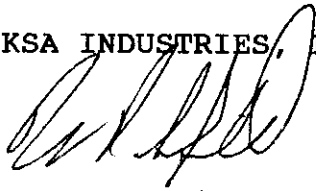


The companies respectfully request that the \$1,000 per plan civil penalty with respect to the amnesty program be waived. The companies originally supplied, on a timely basis, all required data pursuant to Regulation 2520.104-23 of the Department of Labor and Part 1 of Title 1 of the Employee Retirement Income Security Act of 1974 and are simply unable to produce an original copy of the submission.

If there are any other questions with respect to this submission, I can be reached at (713) 797-1500, extension 304.

Sincerely,

KSA INDUSTRIES, INC.



W. R. Scofield
Vice President

WRS/ta
DEFCOMAG.WRS

