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2520032032759

Top Hat Plan Exemption
Pension and Welfare Benefits
Administration
Room N-5644
U. S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Gentlemen:

Pursuant to DOL Reg. 2520.104-23, 40 Fed. Reg. 34536 (August 15, 1975), as amended 54 Fed. Reg. 8629 (March 1, 1989), The Pittston Company 100 First Stamford Place, P.O. Box 120070, Stamford, Connecticut 06912-0700, Employer Identification Number 54-1317776, hereby declares that as an employer it maintains the following unfunded employee benefit plans primarily for the purpose of providing deferred compensation for one or more individuals who are members of a select group of management or highly compensated employees.

1. The employment agreement between The Pittston Company and David L. Marshall, effective February 8, 1984, through March 31, 1989, which had one participant.
2. The agreement between The Pittston Company and David L. Marshall, effective April 1, 1989 through August 31, 1992, which had one current participant.
3. The agreement between David L. Marshall effective September 1, 1992 which had one current participant.
4. The employment agreement between The Pittston Company and Joseph C. Farrell, effective February 9, 1984, through March 31, 1989, which had one participant.

5. The agreement between The Pittston Company and Joseph C. Farrell, effective April 1, 1989, which has one current participant.
6. The employment agreement between The Pittston Company and Jonathan M. Sturman, effective September 6, 1984, through September 31, 1988, which had one participant.
7. The agreement between The Pittston Company and Jonathan M. Sturman, effective October 1, 1988, which has one current participant.
8. The employment agreement between The Pittston Company and Robert D. Duke, effective August 6, 1984 through September 30, 1989 which had one participant.
9. The agreement between the Pittston Company and Robert D. Duke, effective October 1, 1989, which has one current participant.

The above plans are maintained pursuant to written documents which will be provided to the Secretary of Labor or his delegate on request as required by 104(a) (1) of the Employee Retirement Income Security Act of 1974, as amended.

Sincerely,



E. P. Cox

EPC:mlt

cc: Mark S. Dray, Esq.