



UNITED GRAIN CORPORATION

2520043385003

200 S.W. Market Street
Suite 1830
Portland, OR 97201-6281
(503) 228-6424

January 4, 2005

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

Subject: United Grain Corporation NonQualified Plans

Gentlemen:

Pursuant to the provisions of your Regulation 2520.104-23, I am writing to inform you that in December, 2004 we adopted two pension plans for a select group of management employees.

Name of employer: United Grain Corporation of Oregon

Address of employer: 200 SW Market Street, Suite 1830
Portland, Oregon 97201-6281

Employer Identification #: 93-0575964

Number of plans: two
United Grain Corporation NonQualified Retirement Savings Plan
United Grain Corporation Executive NQ True-Up Plan

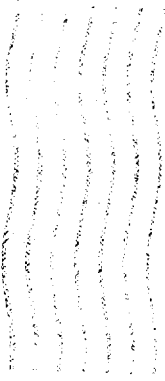
Number of employees covered: three

Yours very truly,

Burke Wood, President



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