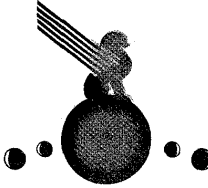


Corporate Headquarters
4065 Commercial Avenue
Northbrook, IL 60062-1851
Tel (847) 559-2000 • Fax (847) 559-2095



Manufacturing Facility
9502 Bayport Boulevard
Pasadena, TX 77502
Tel (281) 474-6200 • Fax (281) 291-6888

Old World Industries I Ltd.
An Old World Industries Company

June 4, 2002

205543



The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 "K" Street NW
Washington, DC 20423-0001

Re: Finance Docket No. 34079, San Jacinto Rail Limited – Authority to Construct – and The Burlington Northern and Santa Fe Railway Company – Authority to Operate – Petition for an Exemption from 49 U.S.C. Section 10901 – Build-out to the Bayport Loop in Houston, Harris County, Texas

Dear Secretary Williams:

Enclosed for filing in the above-captioned proceeding are the original and ten (10) copies of Verified Statement by myself submitted on behalf of Old World Industries in support of the competitive buildout proposal that is the subject of this docket.

Thank you for your attention to this matter.

Sincerely,

Mary E. Nave

Mary E. Nave
Director, Transportation

Enclosures

ENTERED
Office of the Secretary

JUN 05 2002

Part of
Public Record

CC: Larry Spinicelli – President - Old World Industries I, Ltd.
Jim Bryan – President – Old World Industries, Inc.
Jon Erickson – V.P. Operations – Old World Industries, Inc.
Jim Sutton – Sr. Transportation Manager – Old World Industries I, Ltd.

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**ENTERED
Office of the Secretary**

JUN 05 2002

**Part of
Public Record**

Finance Docket No. 34079

**San Jacinto Rail Limited – Authority to Construct – and
The Burlington Northern and Santa Fe Railway Company –
Authority to Operate – Build-Out to the Bayport Loop in
Houston, Harris County, TX**



**Verified Statement of Mary E. Nave
On Behalf of Old World Industries, Inc.
In Support of the Bayport Loop Build-Out**

205543

My name is Mary E. Nave. I have been employed by Old World Industries, Inc. since 1995. My current position is Director, Transportation. My business address is 4065 Commercial Avenue. I am responsible for all modes of transportation for the corporation including barge, rail, and truck operations and negotiations. In that capacity I am familiar with Old World Industries transportation requirements, arrangements and economics.

We have a production facility located in Bayport, TX. The Bayport facility produces ethylene glycol and ethylene oxide. Old World Industries, Inc., ships hundreds of thousands of tons of liquid chemicals each year via barge, rail and tank trucks through our smoothly structured national distribution network. With operating terminals and storage facilities from coast to coast, we must distribute the product(s) where our customers require it.

Our products include: Ethylene glycol - used to manufacture polyester fibers, resins for plastic bottles and recording tape, automotive antifreeze and engine coolants. Ethylene Oxide - a colorless gas used primarily in the production of ethylene glycols, but is also used in the manufacture of surfactants, polyether polyols, ethanolamines, glycol ethers and higher ethylene glycols.

Old World Industries, Inc. USA headquarters is located in Northbrook, IL.

Old World Industries, Inc.
4065 Commercial Avenue
Northbrook, IL 60062
Tel: (+1) 847-559-2082

Additional information about our company can be found on our website at site: <http://www.oldworldind.com>.

Our Bayport facility ships product by rail. Old World is interested in expanding the competitive market for rail options at Bayport and is encouraged by the efforts of San Jacinto Rail and The Burlington Northern and Santa Fe Railway Company (BNSF) to construct a new rail line to provide alternative service to the Bayport Industrial District.

Approximately one half of our product moves by rail to various destinations in the United States. Competitive rail service is vital to our business at Bayport. We believe competitive access by rail is of critical importance to our industry and the customers we serve. Factors such as improved transportation alternatives and economics will clearly play a role in our company's position in the markets we serve.

The efforts of the San Jacinto partnership are to be commended. Please provide prompt approval of this project by the Surface Transportation Board.

I hereby affirm upon penalty of perjury that the foregoing is true based on my knowledge and information.

Mary E. Nave
Name

Dated: June 4, 2002