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THOMAS F. MCFARLAND

March 16, 2007

By e-filing

Vernon A. Williams, Secretary
Surface Transportation Board
395 E Street, S.W., Suite 1149
Washington, DC 20024

Re: Finance Docket No. 34889, *PYCO Industries, Inc. -- Alternative Service -- South Plains Switching, Ltd. Co.*

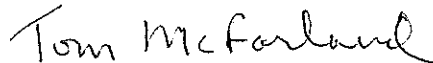
Finance Docket No. 34890, *PYCO Industries, Inc. -- Feeder Line Application -- Lines of South Plains Switching, Ltd. Co.*

Finance Docket No. 34985, *Hanson Aggregates, Inc. and Hanson Aggregates WRP, Inc. -- Alternative Rail Service -- South Plains Switching, Ltd. Co.*

Dear Mr. Williams:

Enclosed please find a Petition For Leave To File A Supplemental Verified Statement Of Edward W. Landreth Correcting Clerical Errors, for filing with the Board in the above referenced matters.

Very truly yours,



Thomas F. McFarland
*Attorney for South Plains
Switching, Ltd. Co.*

BEFORE THE
SURFACE TRANSPORTATION BOARD

PYCO INDUSTRIES, INC. --	)	
ALTERNATIVE RAIL SERVICE --	)	FINANCE DOCKET
SOUTH PLAINS SWITCHING, LTD. CO.	)	NO. 34889
	)	
PYCO INDUSTRIES, INC. -- FEEDER	)	
LINE APPLICATION -- LINES OF	)	FINANCE DOCKET
SOUTH PLAINS SWITCHING, LTD. CO.	)	NO. 34890
	)	
HANSON AGGREGATES, INC. AND	)	
HANSON AGGREGATES WRP, INC. --	)	FINANCE DOCKET
ALTERNATIVE RAIL SERVICE --	)	NO. 34985
SOUTH PLAINS SWITCHING LTD. CO.	)	

**PETITION FOR LEAVE TO FILE A SUPPLEMENTAL
VERIFIED STATEMENT OF EDWARD W. LANDRETH
CORRECTING CLERICAL ERRORS**

SOUTH PLAINS SWITCHING, LTD. CO.
P.O. Box 64299
Lubbock, TX 79464-4299

Petitioner

THOMAS F. McFARLAND
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Attorney for Petitioner

DATE FILED: March 16, 2007

BEFORE THE
SURFACE TRANSPORTATION BOARD

PYCO INDUSTRIES, INC. --	)	FINANCE DOCKET
ALTERNATIVE RAIL SERVICE --	)	NO. 34889
SOUTH PLAINS SWITCHING, LTD. CO.	)	
	)	
PYCO INDUSTRIES, INC. -- FEEDER	)	FINANCE DOCKET
LINE APPLICATION -- LINES OF	)	NO. 34890
SOUTH PLAINS SWITCHING, LTD. CO.	)	
	)	
HANSON AGGREGATES, INC. AND	)	FINANCE DOCKET
HANSON AGGREGATES WRP, INC. --	)	NO. 34985
ALTERNATIVE RAIL SERVICE --	)	
SOUTH PLAINS SWITCHING LTD. CO.	)	

**PETITION FOR LEAVE TO FILE A SUPPLEMENTAL
VERIFIED STATEMENT OF EDWARD W. LANDRETH
CORRECTING CLERICAL ERRORS**

Pursuant to 49 C.F.R. § 1117.1, SOUTH PLAINS SWITCHING, LTD. CO. (SAW) hereby petitions for leave to file the attached Supplemental Verified Statement of Edward W. Landreth Correcting Clerical Errors.

Mr. Landreth's Supplemental Verified Statement eliminates two segments of track from his inventory of trackage owned by SAW on the ground that SAW had sold those track segments to Choo-Choo Properties prior to the date of Mr. Landreth's track inventory. Mr. Landreth simply overlooked the sale of those track segments, so that they were mistakenly included in his track inventory. The record should be corrected to reflect the true facts that those track segments were sold to Choo-Choo Properties. The two track segments sold to Choo-Choo Properties are:

- (1) 4,965 track feet of Track No. 269 formerly leased to Hanson Aggregates for use as Hanson's private track; and
- (2) the portion of Track 107 west of Elm Avenue.

Mr. Landreth points out that those sales of non-rail income producing property are common in the railroad industry, as reflected by sale of most associated shipper lease sites by predecessors of BNSF prior to conveyance of rail lines in Lubbock to SAW.

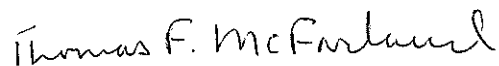
Mr. Landreth also points out that the identified sales of track segments to Choo-Choo Properties were put in motion in November, 2005, before any request was made for alternative rail service or feeder line acquisition.

WHEREFORE, the Supplemental Verified Statement of Edward W. Landreth Correcting Clerical Errors should be admitted into the record.

Respectfully submitted,

SOUTH PLAINS SWITCHING, LTD. CO.
P.O. Box 64299
Lubbock, TX 79464-4299

Petitioner



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DATE FILED: March 16, 2007



Landreth Engineering, LLC

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Cellular: 505 - 239 - 9915 --- Email: EWLandreth@aol.com

March 14, 2007

Hon. Veronon Williams
Secretary
Surface Transportation Board
395 E Street S. W.
Washington, D. C. 20423-0001

Reference: SURFACE TRANSPORTATION BOARD
STB Finance Docket No. 34890

PYCO INDUSTRIES, INC.—FEEDER LINE APPLICATION—
LINES OF SOUTH PLAINS SWITCHING, LTD. CO.

DECISION Decided: January 24, 2007

The Surface Transportation Board (STB) Finance Docket No. 34890 decision of January 24, 2007 refers to information that I provided in an attachment 1 titled "Summary South Plains Switching, Ltd. Co. (SAW) Trackage Owned & Operated" attached to the verified statement of Edward W. Landreth, that was included in SAW's pleadings entitled "Statement in Response to PYCO's Feeder Line Application to Acquire 'All-SAW'" that was filed by the SAW with the STB on September 18, 2006.

Upon reading the STB decision of January 24, 2007 in connection with FD No. 34890, I recognized an error within attachment 1.

The division of ownership of track 269 in the SAW September 18, 2006 filing of track owned and operated contained a clerical error on my part and the error conveys misinformation to the STB and others. I originally showed that the South Plains Switching owned 5,515 ' of this track and had overlooked the fact that South Plains Switching, Ltd., Co had sold this track to Choo-Choo properties and now only owns 150 ' of this track but retains a maintenance and operating agreement for the total length.

Review of my files indicates the property description for the portion of Track 269 that was ultimately conveyed to Choo-Choo properties would have been prepared in November of 2005.

I also reviewed that portion of my attachment 1 dated August 9, 2006 (included with my report dated September 5, 2006) for that portion of Trackage owned by South Plains Switching, Ltd., Co. South of 50th Street and West of Martin Luther King Boulevard in Lubbock, Texas and discovered another error in division of ownership on attachment 1 pertaining to lead track 107 which currently provides service to 84 Lumber. The portion of lead track 107 west of Elm Avenue was conveyed to Choo-Choo Properties and leased back to 84 Lumber with an operating agreement with South Plains Switching, Ltd., Co. in April 2006. This conveyance was based on negotiations with 84 Lumber initiated prior to November 2005.

The enclosed Attachment 1 (revised March 12, 2007) to my report of September 5, 2006 shows that the corrections results in a decrease of Trackage owned by South Plains Switching, Ltd., Co from 133,884' (25.36 miles) to 127,528' (24.15 miles) while the amount of track that is owned by industries increases from 64,554' (12.23 miles) to 70,520' (13.36 miles). This summary like the original summary is based on the former maps and records of the BNSF.

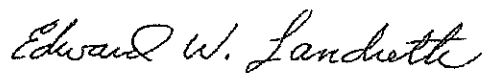
There are several business reasons to sever non-rail income producing property from the railroad. One of the primarily reasons is a railroad cannot continue to maintain industrial trackage that doesn't produce an income to cover the maintenance of the track and the property taxes. Most lessees are quite happy to have the railroad adjacent to their facilities and the option of shipping by rail but are not willing to participate in the true cost of the rail serve.

Typically like the BNSF sales to Glacier Park or Catellus the railroad properties are first offered to the current lessee and/or adjacent property owner prior to the sale to the real estate management company.

Prior to the sale of the former FW&D property remnants to the South Plains Switching Ltd., Co., the BN & ATSF had sold most of the lease sites and readily marketable parcels. Many of the former properties originally attached to what is now the South Plains Switching, Ltd., Co. that were not sold to lessee's were conveyed to real estate management firms that at one time were subsidiaries of the former owners (ie Glacier Park, Catellus) in a manner similar to the Choo-Choo properties sales. The South Plains Switching, Ltd., Co. had identified a few parcels overlooked by the BNSF that could be possibility sold to others or at least offered for sale.

The South Plains Switching, Ltd., Co. utilized the same property management practices that were utilized by the Burlington Northern Santa Fe and the preceding railroad companies (BN, ATSF). The formation of Choo-Choo Properties was based on property management practices that had been discussed since the formation of the South Plains Switching, Ltd., Co.

Sincerely,



Edward W. Landreth, PE

Attachments: Revised Attachment 1 (Revised 3/12/2007)

Revised Attachment 1
To
Second Verified Statement
Of
Edward W. Landreth
(Original Statement Dated September 5, 2006)

Concerning

SOUTH PLAINS SWITCHING, LTD., CO
SUMMARY TRACKAGE OWNED & OPERATED

West of Avenue A - Sec 7 Blk B TTRR Survey

ICC Trk No.	Description	Operated Length	RR Owned	Industry Owned
7	Gilbreath (YGY)	862	862	0
22	Gilbreath (YGY)	761	342	419
25	Old Brite Trucking Site	500	500	0
?	West TX Warehouse (Underwood)	758	758	0
41	Watson Foods	1037	678	359
48	Watson Foods	740	540	200
52	Frito Lay Spur	1068	1068	0
21	Acme Brick Spur	300	300	0
Main Line Corridor		1655	1655	0

Main Line Corridor		5374	5374	0
34	Yard Trk 5 - TEAM 9205	3332	3332	0
20	Yard Trk 1 - TEAM 9201	3330	3330	0
49	Yard Trk 2 - TEAM 9202	2712	2712	0
50	Yard Trk 3 - TEAM 9203	2463	2463	0
46	Yard Trk 4 - TEAM 9204	2969	2969	0
SAW 1	Locomotive Pocket Track	492	492	0
9	East BN Industrial No. 2 Lead	1051	1051	0
73	BN Industrial No. 2 Lead	388	388	0
42	Furr's Spur	780	145	635
35	Orchard Lead	804	804	0
137	PYCO - North Side	789	142	647
21	Acme Brick	780	780	0

East of BNSF /

AT 65	FWD Interchange Trk 2	1368	1368	0
19	FWD Interchange Trk 2	1094	1094	0
Main Line	TEAM No. 9298	4667	4667	0
92	TEAM No. 9200 FWD Siding	3949	3949	0
AT 127	CLIC No. 310 - Attebury	1099	1099	0
AT 128	CLIC No. 311 - Attebury	3120	255	2865
33	CLIC No. 311 - Attebury	419	419	0
AT 129	CLIC No. 312 - Attebury	3029	129	2900
32	CLIC No. 312 - Attebury	81	81	0
AT 130	CLIC No. 313 - Attebury	2936	41	2895
31	CLIC No. 313 - Attebury	1474	1474	0
AT 127	CLIC No. 310 - Compress	1404	705	699

37	Compress Plant 1	3486	3486	0
38	Compress Plant 1- Stub Trk	636	636	0
100	Compress Plant 3	800	368	432
101	Compress Plant 3	894	462	432
102	Runaround Trk - Compress	1253	1253	0
65	Compress Plant 3-2	6008	4820	1188
66	Compress Plant 4	1177	777	400
120	Compress Plant 2-4	2381	2381	0
AT 245	Compress Plant 4	456	0	456
AT 262	Compress Plant 4	1401	995	406
AT 263	Compress Plant 4	984	578	406
?	PYCO Plant 2	6000	165	6000

Orchard Lead Properties South of 34th Street North 50th Street

35	Orchard Lead	5228	5228	0
39	Crawford - Austin Manufacturing	449	170	279
39	H & W Co. Partnership	441	209	232
39	Crawford - Austin Manufacturing	1209	140	1069
47	Humble Oil	278	140	138
62	Commercial Storage & Distr	400	215	185
64	David C. Weaver Grain Company	603	144	459
96	Tom Armstrong Warehouse	469	165	304
?	Mayfield Van Lines	330	185	145
60	Lead	1510	1510	0
93	Runaround Trk	1287	1287	0
61	GTZ, Inc.	696	274	422
63	GTZ, Inc.	598	170	428
80	Weaver Grain	1834	164	1670

FW&D Orchard Lead Properties South of 50th Street

35	Orchard Lead	2557	2557	0
107	Lead BN Industrial No. 3	5992	4737	1255
108	Waples - Platter	703	0	703
109	X/over	225	0	225
110	Payless Cashways	800	0	800
119	Wilkerson	2335	1635	700
124	BN Dock Track	X543	X543	0
130	L & M Warehouse	X260	X165	X95

ATSF Crawford Industrial Properties

AT 259	Lead Eagle Picher	5536	5536	0
AT 260	Eagle Picher	1934	1554	380
AT 275	Eagle Picher	832	432	396
AT 294	Eagle Picher	933	0	933
AT 244	Crawford Lead	12279	12279	0
AT 268	AT Dock Trk	X553	X553	0
AT 269	Furr's Lead	5515	150	5365
AT 296	O G Floyd	2820	172	2648
AT 258	Wilkerson	440	109	331
AT 270	TG&Y	X645	X90	X645
AT 272	Wilkerson	266	158	108
AT 274	Wilkerson	656	110	546
AT 297	Magnolia Seed Company	482	112	370

AT 282	Furr's	X1417	X180	X1237
AT 283	Furr's	X628	0	X628
AT 150	CLIC 0340	3146	3146	0
AT 151	ADM	6165	432	5733
AT 152	ADM	3348	0	3348
AT 153	ADM	1700	0	1700
AT 154	ADM	942	0	942
AT 155	ADM	210	0	210
AT 158	ADM	211	0	211
AT 175	ADM	185	0	185
SAW 2	MLK Unloading Trk	774	127	647
SAW 3	MLK Unloading Trk	2675	0	2675
SAW 4	MLK Unloading Trk	2840	0	2840
AT 4	Feed Lot Burris	1844	832	1012
AT 7	Jarvis Metals - Burris	1826	824	1002
AT 12	Jarvis Metals - Burris	815	622	193

BN Industrial District 2

73	BN Industrial No. 2 Lead	8041	8041	0
?	Noble & Cox	371	156	215
70	Service Stores	656	144	512
75	BN Industrial No. 2 Lead	2215	2215	0
136	Georgia Pacific	405	135	270
118	Georgia Pacific	546	156	390
111	Ajax Grain	942	156	786
79	Ladder Land & Cattle	634	246	388
89	BN Industrial No. 2 Lead	3287	3287	0
91	Texas Bag	1874	692	1182
?	McMillan & Mattox	385	185	200
121	Brokers Trust	392	157	235
106	West Texas Wholesale	464	156	308
105	Foxworth Lubbock Properties	776	155	621
104	Pan Tex Plywood	250	155	95
86	BN Industrial No. 2 Lead	1655	1655	0
97	Armstrong's Supply	855	165	690
87	Lone Star Cotton	383	155	228
95	Frontier Wholesale	967	355	612
98	Roberson Warehouse	1180	257	923
76	Runaround Track	1072	1072	0
114	George Caddel	673	257	416
69	Commercial Storage	485	164	321
Total Feet		197887	127528	70520
Total Miles		37.48	24.15	13.36

Note: X(Track Length)= Retired Track

Landreth Engineering, LLC
12-Mar-07

VERIFICATION

STATE OF NEW MEXICO)
) SS:
COUNTY OF BERNALILLO)

EDWARD W. LANDRETH, being duly sworn on oath, deposes and states that he has read the foregoing statement, that he knows the contents thereof, and that the facts therein stated are true and correct.

Edward W. Landreth
Edward W. Landreth

SUBSCRIBED AND SWORN to
Before me this 14 day of March, 2007

Strid R. Lugowski
NOTARY PUBLIC STATE OF NEW MEXICO



OFFICIAL SEAL
STRID R. LUGOWSKI
NOTARY PUBLIC-STATE OF NEW MEXICO
My commission expires: 8/15/08

My Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2007, I served the foregoing document, Petition For Leave To File A Supplemental Verified Statement Of Edward W. Landreth Correcting Clerical Errors, by e-mail, on the following:

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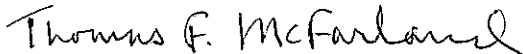
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