UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

In Re:	)	**In Proceedings Under Chapter 11**
	)	
FARMLAND INDUSTRIES, INC.,	)	**Case No. BK-02-50557-JWV**
	)	
Debtor.	)	
	)	
	)	
	)	
COMMERCE BANK, N.A.,	)	**APPLICATION FOR APPOINTMENT OF SUCCESSOR TRUSTEE**
	)	
Movant,	)	
	)	

APPLICATION FOR APPOINTMENT OF SUCCESSOR TRUSTEE FOR $1,500,000.00, COUNTY OF SALINE, NEBRASKA SOLID WASTE DISPOSAL REVENUE BONDS, SERIES 1997A (THE "SERIES 1997A BONDS"): DATED NOVEMBER 4, 1997 BY COMMERCE BANK, N.A., TRUSTEE

COMES NOW, Commerce Bank, N.A., a national banking association with its principal office in Kansas City, Missouri, "the Trustee", Trustee under a certain Indenture of Trust, dated October 1, 1997, between Saline County, Nebraska and the Trustee, and states as follows:

1. The Trustee is the named Trustee under an Indenture of Trust dated October 1, 1997, between Saline County, Nebraska and the Trustee, concerning $1,500,000.00 Dollar Solid Waste Disposal Revenue Bonds (Farmland Foods, Inc. project), Series 1997A, dated November 4, 1997, (the Indenture of Trust).

2. Under the Indenture of Trust, the Trustee is granted the right, among others, to collect, receive and distribute all lease payments due by Farmland Foods, Inc., the Debtor, under a certain lease agreement also dated October 1, 1997, between Saline County, Nebraska and Farmland Foods, Inc.

3. Under the terms of the Indenture of Trust, particularly Section 709 thereof, the Trustee is given the right, at any time, to resign and be discharged of its duties by giving not less than forty-five (45) days written notice to Saline County, Nebraska, "the issuer", Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A., "Rabobank Nederland", New York branch, New York, its successors and assigns, "the credit provider", Farmland Foods, Inc., "the company", and to the holders of the bonds issued by Saline County, Nebraska.

4 On June 14, 2002, the Trustee gave written notice of its resignation to the issuer, the credit provider, the company and the holders of the bonds. Although more than forty-five days have passed since the Trustee's written notice, no successor Trustee has been appointed by either the issuer, Saline County, Nebraska or the bond holders. Under the terms of Section 709, the resignation of the Trustee does not take effect until a successor has been duly appointed in accordance with the terms of the Indenture of Trust and the successor Trustee shall have assumed in writing all the duties and obligations of the Trustee under the Indenture of Trust.

5 Section 711 of the Indenture of Trust further provides, that if no successor Trustee is appointed within forty-five days after the Trustee gives written notice as provided in Section 709, then the Trustee may apply to any court of competent jurisdiction to appoint a successor Trustee. The Trustee believes that this Court is a court of competent jurisdiction as the Indenture of Trust Agreement and related documents involve property of the estate.

6 The Trustee requests the Court to appoint a successor Trustee.

WHEREFORE, Commerce Bank, N.A., Trustee under the Indenture of Trust between Saline County, Nebraska and Commerce Bank, N.A., as Trustee, dated October 1, 1997, moves the Court to appoint a successor Trustee under the Indenture of Trust Agreement and to approve the resignation of Commerce Bank as Trustee and to allow Commerce Bank to turn over and deliver to the successor

Trustee all monies, documents and property that it holds pursuant to the Indenture of Trust, and for such other and further relief as the Court deems just in the premises.

SHUGHART THOMSON & KILROY, P.C.

By _/s/ Thomas J. O'Neal_____
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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Trustee's Application for Appointment of Successor Trustee by either electronic or depositing a copy of same in the U.S. Mail, postage prepaid, on this 15th day of August, 2002 to the following:

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