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March 31, 2009

CITGO Unbranded Marketer:

Each year from June 1 through Sept. 15, the “Reid Vapor Pressure” (RVP) of gasoline is restricted at the retail level to help reduce Volatile Organic Compound (VOC) emissions into the atmosphere. With the introduction of reformulated gasoline into certain areas, and many state or local areas mandating more restrictive gasoline RVPs, the program has become more complex. The following information should assist and guide you in determining the correct gasoline RVPs required for your marketing area. Please be advised that this information reflects CITGO’s understanding of the regulatory requirements and is subject to change by EPA or state agencies.

Conventional Gasoline

Federal regulations limit the maximum allowable RVP for conventional gasoline at the retail level for the period June 1 through Sept. 15. During this period, the maximum allowable RVP is 9.0 p.s.i., except for certain ozone non-attainment areas where the maximum RVP is 7.8 p.s.i. or lower (see “Special Situations” section below for areas requiring less than 7.8 p.s.i.). A list of all such non-attainment areas in the eastern half of the United States requiring 7.8 p.s.i. RVP (or lower) conventional gasoline is attached and marked *Exhibit A*. Hereafter, any reference to RVP level refers to the maximum allowable p.s.i.

Per federal regulations, conventional gasoline meeting the 9.0 p.s.i. RVP requirement will be available at all CITGO conventional gasoline terminals on or before May 1. Additionally, conventional gasoline meeting the 7.8 p.s.i. RVP (or lower) requirement will be available around May 15 at the indicated terminals listed in the attached *Exhibit C*.

Conventional Gasoline Areas - Special Situations

The specific counties referenced below are listed in *Exhibit A*.

Cincinnati and Dayton, OH

Beginning June 1, 7.8 p.s.i. RVP conventional gasoline will be required in the following eight counties: Butlee, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warrar.

Detroit, MI

Per state regulations, Lewanee, Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw and Wayne counties will require 7.0 p.s.i. RVP conventional gasoline.

Kansas City, MO

The Kansas Department of Health and Environment and the Missouri Department of Natural Resources enacted state regulations for the Kansas City Metropolitan Area,

which lowered the RVP of summer gasoline from 7.2 p.s.i. to 7.0 p.s.i. This began with the 2001 ozone season.

Birmingham, AL

Two counties in the Birmingham area will again require 7.0 p.s.i. RVP conventional gasoline.

Atlanta, GA

The affected area around Atlanta is 45 counties and will require 7.0 p.s.i. RVP low sulfur conventional gasoline.

El Paso, TX

In the El Paso area, the TCEQ requires that "no person shall place, store or hold, in any stationary tank, reservoir or other container, any gasoline that may ultimately be used in a motor vehicle, with an RVP greater than 7.0 p.s.i. or that does not meet the EPA specifications for RFG." The requirement applies from June 1 through Sept. 15 of each year for retail facilities and May 1 through Sept. 15 for terminals.

East Texas

Under state regulations, the Texas TCEQ adopted a state rule establishing cleaner gasoline and vapor recovery equipment requirements in 95 counties in the eastern half of Texas. The rule requires that from May 1 through Oct. 1 of each year, "no person shall transfer or allow the transfer, place, store or hold, in any stationary tank, reservoir or other container, any gasoline with an RVP greater than 7.8 p.s.i." The RVP control period runs from June 1 through Oct. 1 of each year for gasoline dispensing facilities and May 1 through Oct. 1 of each year for all other affected facilities. The affected counties are shown in *Exhibit A*.

Louisville, KY

Under state regulation, Clark and Floyd counties in Indiana (Louisville, KY, area), will require 7.8 p.s.i. RVP conventional gasoline. The state regulation allows VOC Region 2 Reformulated Gasoline to be used in these counties in place of conventional gasoline.

Pittsburgh-Beaver Valley Area, PA

Per state regulations, the following counties will require 7.8 p.s.i. RVP conventional gasoline: Allegheny, Armstrong, Beaver, Butler, Forsythe, Fayette, Washington and Westmoreland. CITGO plans to supply the 7.8 p.s.i. RVP conventional gasoline to these counties. RFG cannot be used as a compliant fuel in Allegheny County.

Reformulated Gasoline (RFG)

With the transition to the VOC control season each year, the governing parameter in the federal regulations for RFG is VOC percent reduction. There is a minimum allowable VOC percent reduction specification RFG at the retail level for the period June 1 through Sept. 15. During this period, the minimum allowable VOC reduction per the federal regulations is 25.0 percent in VOC Control Region 1 and 23.4 percent in VOC Control Region 2. The EPA issued the Seasonal Transition Final Rule (published in the Federal Register on Feb. 26, 2002) that provides

a VOC enforcement tolerance of 2 percent. A list of RFG areas in the eastern half of the United States and their appropriate VOC, percent reduction specification is attached and marked ***Exhibit B***.

Per federal regulations, RFG meeting the required VOC levels will be available at the CITGO RFG terminals shown in ***Exhibit C*** on May 1. For the period May 1 through Sept. 15, only VOC Controlled Region 1 RFG may be delivered to Region 1 RFG retail locations, and either VOC Controlled Region 1 or Region 2 RFG may be delivered to Region 2 RFG retail locations. Product transfer documents, including bills-of-lading for VOC-controlled RFG containing ethanol, are required by the regulations to show that the RFG is VOC controlled and that it contains ethanol.

Caution should be taken to always know the type of product you are delivering to your retail locations. Many states require retail pump labeling for gasoline containing ethanol, and it is recommended that you confirm the requirements for your area.

Conversion of Retail Locations

Please note that federal regulations require and hold you responsible for completing the conversion of your retail locations by June 1. If an EPA or state inspector obtains a sample from a retail location beginning June 1, he will expect the RVP to test at or below the federal or state specification. The above requirements also apply to wholesale purchaser-consumer locations.

Should you have any questions relating to the gasoline RVPs or the availability of products at terminals that are convenient to you, please call your Commercial Regional Manager as follows:

Terry Sullivan (Region Manager)

1-832-486-4200

John Kiernan (SW Region)

1-817-358-9476

Jamey Gill (SE Region)

1-918-492-8439

Marshall McGowan (MW/MA Regions)

1-217-498-9791

Sincerely,



Bill Lotz
Light Oils Compliance Manager
CITGO Petroleum Corporation

EXHIBIT A
Conventional Gasoline Areas in the Eastern Half of the United States
Requiring 7.8 p.s.i. RVP (or lower if indicated)
from June 1 through Sept. 15 (or date indicated)

ALABAMA

Birmingham Area (7.0 p.s.i.)
Jefferson and Shelby counties

FLORIDA

Jacksonville Area
Duval County

Miami-Ft. Lauderdale - W. Palm Beach
Broward, Dade and Palm Beach counties

Tampa-St. Petersburg - Clearwater
Hillsborough and Pinellas counties

GEORGIA

Atlanta Area (45 counties) (7.0 p.s.i.)
Barrow, Banks, Bartow, Chattahoochee,
Butts, Clarke, Carroll, Floyd, Cherokee,
Gordon, Clayton, Cobb, Heard,
Jasper, Coweta, Jones, Dawson, Lamar,
DeKalb, Lumpkin, Douglas, Madison,
Fayette, Meriwether, Forsyth, Monroe,
Fulton, Morgan, Gwinnett, Oconee,
Hall, Polk, Haralson, Pike, Henry, Putnam,
Jackson, Troup, Newton, Upson, Paulding,
Pickens, Rockdale, Spaulding and Walton
counties

INDIANA

**(7.8 p.s.i. Conventional or
VOC Control Region 2 RFG)**
Clark and Floyd county

KANSAS

Kansas City Area (7.0 p.s.i.)
Johnson and Wyandotte counties

LOUISIANA

Baton Rouge Area
Ascension, East Baton Rouge, Iberville,
Livingston, Pointe Coupee and West Baton
Rouge parishes

Beauregard Parish Area
Beauregard Parish

Grant Parish Area
Grant Parish

LOUISIANA (continued)

Lafayette Area
Lafayette Parish

Lafourche Parish Area
Lafourche Parish

Lake Charles Area
Calcasieu Parish

New Orleans Area
Jefferson, Orleans, St. Bernard, St. Charles,
St. James and St. Mary parishes

MICHIGAN

**Detroit Area (7.0 p.s.i. Conventional MTBE-
free gasoline)**
Lenawee, Livingston, Macomb, Monroe,
Oakland, St. Clair, Washtenaw and Wayne
counties

MISSOURI

Kansas City Area (7.0 p.s.i.)
Clay, Jackson and Platte counties

MAINE

Androscoggin, Cumberland, Kennebec, Knox,
Lincoln, Sagadahoc and York counties

NORTH CAROLINA

Charlotte-Gastonia Area
Gaston and Mecklenburg counties

Greensboro-Winston-Salem-Highpoint
Davidson, Davie (partial - that part of Davie
County bounded by the Yadkin River,
Dutchmans Creek, North Carolina Highway
801, Fulton Creek and back to Yadkin River),
Forsythe and Guilford counties

Raleigh-Durham Area
Durham, Granville (Dutchville Township only)
and Wake counties

PENNSYLVANIA

Pittsburgh-Beaver Valley Area
Allegheny, Armstrong, Beaver, Butler,
Forsythe, Fayette, Washington and
Westmoreland counties

EXHIBIT A (CONTINUED)

TENNESSEE

Memphis Area

Shelby County

Nashville Area

Davidson, Rutherford, Sumner, Williamson
and Wilson counties

TEXAS

El Paso Area (7.0 p.s.i.)

El Paso County

Beaumont-Port Arthur Area

Hardin, Jefferson and Orange counties

**Eastern Texas – 95 counties (7.8 p.s.i., May
1 through Oct. 1)**

Anderson, Angelina, Aransas, Atascosa,
Austin, Bastrop, Bee, Bell, Bexar, Bosque,
Bowie, Brazos, Burleson, Caldwell, Calhoun,
Camp, Cass, Cherokee, Colorado, Comal,
Cooke, Coryell, De Witt, Delta, Ellis, Falls,
Fannin, Fayette, Franklin, Freestone, Goliad,
Gonzales, Grayson, Gregg, Grimes,
Guadalupe, Harrison, Hays, Henderson, Hill,
Hood, Hopkins, Houston, Hunt, Jackson,
Jasper, Johnson, Karnes, Kaufman, Lamar,
Lavaca, Lee, Leon, Limestone, Live Oak,
Madison, Marion, Matagorda, McLennan,
Milam, Morris, Nacogdoches, Navarro,
Newton, Nueces, Panola, Parker, Polk, Rains,
Red River, Refugio, Robertson, Rockwall,
Rusk, Sabine, San Jacinto, San Patricio, San
Augustine, Shelby, Smith, Somervell, Titus,
Travis, Trinity, Tyler, Upshur, Van Zandt,
Victoria, Walker, Washington, Wharton,
Williamson, Wilson, Wise and Wood counties

EXHIBIT B
Reformulated Gasoline Areas in the
Eastern Half of the United States
June 1 through Sept. 15

**VOC percent reduction values shown in this exhibit represent the appropriate
VOC standard in the regulations**

VOC Control Region 1
(25.0 Percent VOC Reduction Min.)

DISTRICT OF COLUMBIA

Entire Area

ILLINOIS

East St. Louis Area

Madison, Monroe, St. Clair and Stafford counties

MARYLAND

Baltimore City and Ann Arundel, Baltimore, Calvert, Carroll, Charles, Frederick, Hartford, Howard, Kent, Montgomery, Prince George's and Queen Anne's counties

MISSOURI

St. Louis Area

City of St. Louis and Franklin, Jefferson, St. Charles and St. Louis counties

VIRGINIA

Alexandria City, Fairfax City, Fairfax County, Falls Church City, Loudoun County, Manassas City, Manassas Park City, Prince William County, Stafford County and Washington, DC MSA

Norfolk-Virginia Beach-Newport News

Chesapeake City, Hampton City, James City County, Newport News City, Norfolk City, Poquoson City, Portsmouth City, Suffolk City, Virginia Beach City, Williamsburgh City and York County

Richmond-Petersburg

Charles City County, Chesterfield County, Colonial Heights City, Hanover County, Henrico County, Hopewell City and Richmond City

TEXAS

Houston/Galveston Area

Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery and Waller counties

Dallas-Ft. Worth Area

Collin, Dallas, Denton and Tarrant counties

VOC Control Region 2
(23.4 Percent VOC Reduction Min.)

CONNECTICUT

Entire State

DELAWARE

Entire State

KENTUCKY

Boone, Bullitt (Part), Campbell, Jefferson, Kenton and Oldham (Part) counties

MARYLAND

Cecil County

MASSACHUSETTS

Entire State

NEW HAMPSHIRE

Hillsborough, Merrimack, Rockingham and Strafford counties

NEW JERSEY

Entire State

NEW YORK

Bronx, Dutchess, Essex, Kings, Nassau, New York, Orange, Putnam, Queens, Richmond, Rockland, Suffolk and Westchester counties

PENNSYLVANIA

Bucks, Chester, Delaware, Montgomery and Philadelphia counties

RHODE ISLAND

Entire State

EXHIBIT B (CONTINUED)

***Midwest Only, for RFG areas
with 10 percent ethanol blends of
VOC Control Region 2
(21.4 Percent VOC Reduction Min.)***

ILLINOIS

Cook, Du Page, Grundy (Part - Aux Sable and Goose Lake Townships), Kane, Kendall (Part - Oswego Township), Lake, McHenry and Will counties

INDIANA

Lake and Porter counties

WISCONSIN

Kenosha, Milwaukee, Ozaukee, Racine, Washington and Waukesha counties

EXHIBIT C

Unbranded Marketers

Products Available at Terminals In or Near RFG Areas and 7.8 psi RVP (or lower) Conventional Gasoline Areas (other terminals will have 9.0 psi RVP Conventional Gasoline)

		CONVENTIONAL		RFG	
		<=7.8	9.0	VOC Region 1 (25.0%VOC Reduction Minimum)	VOC Region 2 (23.4%VOC Reduction Minimum)
Alabama					
Birmingham	CITGO	7.0	x		
Connecticut					
Rocky Hill	CITGO				Ethanol
Florida					
Pt. Everglades	CITGO/TPSI	x			
Taft	Kinder Morgan		x		
Tampa	CITGO		x		
Georgia					
Doraville	CITGO	7.0			
Virginia					
Chesapeake	CITGO			Ethanol	
Richmond	CITGO		x	Ethanol	
Fairfax	CITGO			Ethanol	
Roanoke	CITGO/Amoco		x		
Louisiana					
Kenner	Motiva	x			
Lake Charles	CITGO	x			
Maryland					
Baltimore	CITGO/Star			Ethanol	
Massachusetts					
Braintree	CITGO				Ethanol
New Jersey					
Linden	CITGO				Ethanol
Pennsylvania					
Coraopolis	PPC	x	x		

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		CONVENTIONAL		RFG	
		<=7.8	9.0	VOC Region 1 (25.0% VOC Reduction Minimum)	VOC Region 2 (23.4% VOC Reduction Minimum)
New York					
Albany	CITGO		x		
Brooklyn	Motiva				Ethanol
North Carolina					
Charlotte	CITGO	x	x		
Greensboro	CITGO/Magellan		x		
Selma	CITGO		x		
Tennessee					
Nashville	CITGO	x			
Texas					
Corpus Christi	CITGO	x			
Victoria	CITGO	x			
San Antonio	CITGO	x			
Center	Mobil	x			
Pasadena	KinderMorgan				Ethanol
Beaumont	Motiva	x			
Michigan					
Detroit	Buckeye	(2)			
Novi	Delta Fuels	(2)			
Jackson	CITGO		x		
Niles	CITGO		(2)		
Ferrysburg	CITGO		(2)		
Ferrysburg	Buckeye		(2)		
Holland	Holland		x		
Owosso	Sunoco		x		
Flint	Buckeye		x		
Bay City	Marathon		x		

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		CONVENTIONAL		RFG	
		<=7.8	9.0	VOC Region 1 (25.0% VOC Reduction Minimum)	VOC Region 2 (23.4% VOC Reduction Minimum)
Wisconsin					(1)
Milwaukee	CITGO/Mobil				Ethanol
Milwaukee	Marathon		x		
Green Bay	CITGO		x		
Madison	CITGO		x		
Junction City	Flint Hills		x		

		CONVENTIONAL		RFG	
		<=7.8	9.0	VOC Region 1 (23.4% VOC Reduction Minimum)	VOC Region 2 (21.4% VOC Reduction Minimum)
Illinois					(1)
Arlington Heights East	CITGO				Ethanol
Arlington Heights West	CITGO				Ethanol
Lemont	CITGO				Ethanol
Effingham	Buckeye		x		
Forsyth	ConocoPhillips		x		
Norris City	HWRT		x		
Champaign	Marathon		x		
Peoria	CITGO		x		
Kankakee	ConocoPhillips		(2)		
Rockford	Marathon/Ashland		(2)		
East St. Louis	ConocoPhillips		x	Ethanol	
Indiana					(1)
East Chicago	ConocoPhillips		(2)		
Hammond	Exxon/Mobil				Ethanol
Huntington	CITGO		x		
Zionsville	Buckeye		x		
Princeton	Teppco		x		

EXHIBIT C

Unbranded Marketers

Products Available at Terminals In or Near RFG Areas and 7.8 psi RVP (or lower) Conventional Gasoline Areas (other terminals will have 9.0 psi RVP Conventional Gasoline

NOTE (1) For RFG in the Chicago and Milwaukee RFG covered areas, RFG blended with 10 vol. % ethanol, EPA's Final Rule from the summer of 2001 allows the VOC, % reduction minimum specification of 21.4%.

NOTE (2) Clear and ethanol blended products are available.

**RUL = REGULAR UNLEADED
MG = MID-GRADE UNLEADED
PUL = PREMIUM UNLEADED**