

ON BEHALF OF AMERICA'S INDEPENDENT AND SMALL REFINERIES

February 19, 2026

Dear Rural Domestic Energy Council,

As an important component of America's energy infrastructure, we stand in opposition to the proposed RFS reform "compromise" presented by the Rural Domestic Energy Council. We are voicing our position through this letter because API who represents large integrated oil companies does not represent our collective voice nor the voice of the refining sector.

Who we are:

1. We are small and independent American refining companies who face harm due to the Renewable Fuel Standard and the mandates this program imposes.
2. The signatories represent a substantial number of small refineries, 27 refining facilities, and over 2 million barrels per day of America's domestic refining capacity.
3. Our facilities and businesses operate across 17 states. We directly employ tens of thousands of American workers, and indirectly we create hundreds of thousands of additional jobs that help support our refinery operations.

Why we are here:

The proposed E15 framework tilts the scale in favor of the world's largest oil and renewable fuel companies. Additionally, the ethanol lobby has constantly stated its intention to use year-round approval of E15 to pressure policymakers to drive already unachievable ethanol mandates even higher. As a result, authorizing year-round E15 sales without appropriate checks in place to contain the costs of the ethanol mandate will result in the closure of certain refining facilities, the loss of good-paying jobs, and increased domestic fuel prices. This undermines domestic energy dominance and raises the cost of living for Americans.

What we propose:

Our proposed compromise allows for extending the RVP waiver to E15 blends while also enacting reforms to lower fuel costs for Americans and keep our domestic manufacturing facilities open. These priorities help reduce RFS compliance costs which currently **add \$9 to the cost of a barrel of oil**. In sum, we stand ready to support E15 legislation which also incorporates all three of the following provisions:

1. Continues to authorize EPA to grant small refinery exemptions under the existing framework, with no artificial cap on the amount that may be awarded.
2. Prohibits EPA from increasing annual mandates through the "reallocation" of exempted small refinery volumes.

3. Limits the annual ethanol mandate to an amount no higher than the actual consumption from the previous year.

It is essential that this Council’s proposed solution does not adversely affect the delicate balance of domestic energy production. One way to ensure that this does not happen, is to pair year-round E15 with the reforms mentioned above.

Thank you for your time as well as your important work on this needed legislation.

Our Facilities

Company	State	Site
Alon Refining Krotz Springs Inc	Louisiana	Krotz Springs
Alon USA Energy Inc	Texas	Big Spring
American Refining Group Inc	Pennsylvania	Bradford
Chalmette Refining LLC	Louisiana	Chalmette
CPI Operations LLC	New Jersey	Paulsboro
Delaware City Refining Co LLC	Delaware	Delaware City
Delek Refining Ltd	Texas	Tyler
Delek US	Tennessee	Nashville
Hunt Refining Co	Alabama	Tuscaloosa
Hunt Southland Refining Co	Mississippi	Sandersville
Lima Refining Company LLC	Ohio	Lima
Lion Oil Co	Arkansas	El Dorado
Martinez Refining Co LLC	California	Martinez
Monroe Energy LLC	Pennsylvania	Trainer
Ohio Refining Company LLC	Ohio	Toledo
PAR Hawaii Refining LLC	Hawaii	Ewa Beach
Par Montana LLC	Montana	Billings

Paulsboro Refining Co LLC	New Jersey	Paulsboro
Placid Refining Company LLC	Louisiana	Port Allen
Suncor Energy (USA) Inc	Colorado	Commerce City East
Suncor Energy (USA) Inc	Colorado	Commerce City West
Superior Refining Company LLC	Wisconsin	Superior
The San Antonio Refinery	Texas	San Antonio
Toledo Refining Co LLC	Ohio	Toledo
Torrance Refining Co LLC	California	Torrance
US Oil & Refining Co	Washington	Tacoma
Vertex Refining Alabama LLC	Alabama	Saraland
Wyoming Refining Co	Wyoming	NewCastle