

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580



Office of the Director
Bureau of Competition

SEP 22 2008

Tom D. Smith, Esq.
Jones Day
51 Louisiana Avenue, N.W.
Washington, D.C. 20001-2113

Re: Alon/Apex (Edgington), FTC File No. 061-0224

Dear Mr. Smith:

The Federal Trade Commission has conducted a nonpublic investigation to determine whether the proposed merger of Alon Israel Oil Company Ltd. with Edgington Oil Company, a wholly owned subsidiary of Apex Oil Company, Inc., may violate Section 7 of the Clayton Act or Section 5 of the Federal Trade Commission Act.

