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PETROLEUM CLUB
of Houston

May 20, 1998

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5638
U. S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D. C. 20210

Re: Petroleum Club of Houston
800 Bell, 43rd Floor
Houston, Texas 77002
EIN: 74-1098713

Gentlemen:

Pursuant to 29 C.F.R. § 2520.104-23(b)(1), you are hereby notified that the above-captioned employer has begun to maintain five (5) additional plans primarily for the purpose of providing deferred compensation to a select group of management or highly compensated employees. Each plan benefits one employee.

The plan documents will be provided upon request by the Secretary of Labor.

Sincerely,

PETROLEUM CLUB OF HOUSTON

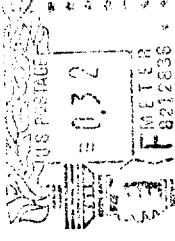

Hadi Granger
Comptroller

cv

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800 BELL AVENUE • HOUSTON, TEXAS 77002



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