

**Comment 1 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 1st Workshop.**

First Name: Catherine
Last Name: Price
Email Address: catherine.price@shell.com
Affiliation: Shell

Subject: Albion Heavy Synthetic GHG intensity in LCFS 2013 crude baseline
Comment:

We have reviewed the recently published draft calculation of the California Industry Average Crude Carbon Intensity for 2013. We have noted that GHG intensity of AHS is reported in this document as 21.02 gCO₂e/MJ, a value calculated with OPGEE 1.0.

We believe that this value of 21.02 gCO₂e/MJ contains an error due to higher and lower heating values being confused when coefficients from Canada's GHGenius model (which works in HHV) were used unchanged in California's OPGEE 1.0 model (which works in LHV). My colleague Trevor Stephenson engaged in some communication on this matter with Adam Brandt which resulted in the OPGEE 1.0 model being corrected. The resulting updated value of 19.86 gCO₂e/MJ was published in the minutes of CARB's "LCFS Proposed 2013 Regulatory Amendments" workshop of March 5th, 2013 (see http://www.arb.ca.gov/fuels/lcfs/regamend13/Draft_Crude_CI_Values_%28OPGEEv1.1_DraftA%29_March_4_2013.pdf).

Please could you confirm that this value will be corrected in the 2013 calculation and in upcoming regulatory updates to adopt the latest "OPGEE" model (v. 1.1) going forward?

Thank you very much.

Kind regards,
Catherine

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-06-24 03:44:44

No Duplicates.

Comment 2 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws) - 2nd Workshop.

First Name: Elena

Last Name: Guilfoil

Email Address: elena.guilfoil@ecy.wa.gov

Affiliation: Washington State Dept. of Ecology

Subject: Possible Table Mistakes

Comment:

I offer suggestions for correcting possible mistakes in the table. My comments refer to references to 2012 instead of 2014. If you intended the 2012 references, then I misunderstood your intent.

1. Please take a look at the title of the table as it appears to be a combination of the 2012 and 2013 table titles.

2012--Table 1: 2012 Crude Average Carbon Intensity Calculation

2013--2013 Crude Average Carbon Intensity Calculation

2014--Table 1: 2012 Refinery Crude Supply

The language in the 2014 document is similar to the other 2 LCFS Crude Oil Lifecycle Assessments so you might consider changing the title to "2014 Crude Average Carbon Intensity Calculation."

2. Under the "Crude Name" column, the first item is "2012 Volume Weighted Average CI." This analysis calculates the average CI for 2014. Should the cell say "2014 Volume Weighted Average CI"?

3. 11.35 is listed in the first cell under the "CI" column. Your document says the 2014 crude average carbon intensity is 11.30.

4. The last column heading is "2012 Volume." Should this be 2012, 2013 and 2014 Volume? This would be consistent with formatting in the other 2 assessments.

5. The first cell in the last column lists 594,494,779. I am confused why there is a number in this cell when the other 2 assessments left this cell blank. You may simply have changed your format but I didn't see an explanation for this change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-05-19 12:28:43

No Duplicates.

**Comment 3 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 2nd Workshop.**

First Name: Jason

Last Name: Goklaney

Email Address: jgoklaney@envirotechteam.com

Affiliation:

Subject: 2014 CI Value Comment

Comment:

Please see attachment "LCFS Comment" which addresses variation among the CI value assigned to a specific field within California and the CI values of producers located within the field when calculated individually.

Attachment: www.arb.ca.gov/lists/com-attach/9-lcfs-crude-oil-ws-Uz8CZ1A3VXUCW1Q3.pdf

Original File Name: LCFS Comment.pdf

Date and Time Comment Was Submitted: 2015-06-02 15:23:05

No Duplicates.

**Comment 4 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 3rd Workshop.**

First Name: Chris

Last Name: Torres

Email Address: dadofranki@yahoo.com

Affiliation: Farmer

Subject: Reasons for more regulation

Comment:

Why does CARB believe we need more regulation?

CARB does not have the funding to regulate more. All this does is put businesses at a disadvantage in the state. It makes for higher living costs for individuals. This just seems like a grab for more public jobs.

Public entities do not create jobs that are viable for the future. They have to be paid for, usually by higher taxes on all.

How dependable is the science behind this? It has been proven in the past that the science is not dependable and quite suspect.

Scrap this process.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-05-22 05:59:54

No Duplicates.

**Comment 5 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 3rd Workshop.**

First Name: Tim

Last Name: Lovley

Email Address: tlovley@macphersonenergy.com

Affiliation:

Subject: Comments to LCFS Crude Oil WS 2017

Comment:

Please see attached

Attachment: www.arb.ca.gov/lists/com-attach/11-lcfs-crude-oil-ws-AWxROFw+Ul4DNwY2.docx

Original File Name: MOC 2017 CI Value Comments 06.05.2018 (2).docx

Date and Time Comment Was Submitted: 2018-06-05 16:44:50

No Duplicates.

**Comment 6 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 3rd Workshop.**

First Name: Myron

Last Name: Roy

Email Address: PTRILLAPHATBEATZENT29@GMAIL.COM

Affiliation: 0

Subject: Where to buy crude oil

Comment:

I think oil companies could use better environmental agents in environmental clean ups being sick from their environmental toxins is why I'm writing to buy oil facility ? So I can learn how oil facilities dispose of their bio waste.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-28 21:23:17

No Duplicates.

**Comment 7 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 3rd Workshop.**

First Name: Rock
Last Name: Zierman
Email Address: rock@cipa.org
Affiliation: CIPA

Subject: CIPA LCFS Crude CI Comments
Comment:

Please find attached CIPA's Comments.

Attachment: www.arb.ca.gov/lists/com-attach/13-lcfs-crude-oil-ws-AGNVOIUkU2EDWgll.pdf

Original File Name: CIPA LCFS Crude Oil CI Comments - Final.pdf

Date and Time Comment Was Submitted: 2019-12-09 08:11:26

No Duplicates.

**Comment 8 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 5th Workshop.**

First Name: Tina
Last Name: Cremer
Email Address: tina@h2xero.com
Affiliation: CLCA

Subject: Crude Oil
Comment:

Please slow or stop allowing crude oil development

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 13:40:11

No Duplicates.

**Comment 9 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 5th Workshop.**

First Name: Richard

Last Name: Scott

Email Address: royalcrowntowing1@gmail.com

Affiliation: royal crown towing llc

Subject: Objection of carb and EPA rulings

Comment:

This is My objection to the overreach of the EPA emission rulings in 2024 this will cause significant cost and reliability burdens to small businesses and citizens, cause supply chain issues also EPA has not calculated the effects of mining for the precious metals in electric vehicles on a vast scale and how this will affect other parts of the world and the emissions which are admitted by mining minerals for EVS also there's no infrastructure whatsoever for electric semi trucks and the technology is very new and untested and unreliable it's not feasible for interstate commerce and small business owners to spend 400k on a truck that may last 8 years the EPA and carb are un elected officials pushing their political agendas on the citizens of the United States, the representatives of these departments are not elected by the people of the US and these laws are being forced upon the citizens of the United States unlawfully there's no evidence that 5,000 people will be saved from changing from diesel to electric vehicles I'm sure if the research was done more people would die in poor counties due to the poisoning of land and water from mining and manufacturing electric vehicles on a massive scale in other areas of the world, water resources would be severely depleted to wash the rocks to obtain colbot lithium and other minerals used in batteries to replace all the internal combustion Diesel trucks with electric vehicles

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Best Regards

Richard J Scott

CEO / Founder / Operator

(DBA Royal Crown Transport Group)

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-02 18:26:50

No Duplicates.

Comment 10 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil- ws) - 2nd Workshop.

First Name: Chris

Last Name: Torres

Email Address: christorres@fandltrucking.com

Affiliation: Transport company

Subject: Analysis for LCFS Crude oil life cycle

Comment:

How can any of this analysis be honestly regarded as true information on this subject? When the science used is provided by people appointed by a biased party the result will be biased toward the beliefs of the appointing party. This is just more b.s submitted to ruin the lives of people in this state that have businesses needing to use oil to operate their businesses. This bias is uncalled for and deceptive. We are not stupid as you people think we are. Stop this now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-08-03 23:05:39

No Duplicates.

**Comment 11 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-
ws) - 2nd Workshop.**

First Name: Kay

Last Name: Brown

Email Address: kbrown@pacificenvironment.org

Affiliation: Pacific Environment

Subject: Pacific Environment's Comment 2022 Annual Crude Average Carbon Intensity
Calculation Draft

Comment:

Please see attached for our comment letter. Thank you for your
consideration.

Attachment: www.arb.ca.gov/lists/com-attach/18-lcfs-crude-oil-ws-ViYBYgNdAzxRNFI0.pdf

Original File Name: PE LCFS comment to CARB August 2023[KB].pdf

Date and Time Comment Was Submitted: 2023-08-17 16:27:50

No Duplicates.

**Comment 12 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-
ws) - 2nd Workshop.**

First Name: Tanya
Last Name: DeRivi
Email Address: tderivi@wspa.org
Affiliation: WSPA

Subject: WSPA Comments on Draft 2022 Annual Crude Avg CI Calculation
Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/19-lcfs-crude-oil-ws-VyBRJFIjAjAEXQRo.pdf

Original File Name: WSPA LCFS Draft 2022 Annual Crude Avg CI Calc Comment Letter 8-18-2023.pdf

Date and Time Comment Was Submitted: 2023-08-18 09:32:50

No Duplicates.

There are no comments posted to Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws) that were presented during the Workshop at this time.