

  
Western States Petroleum Association  
**Western States Petroleum Association**  
Credible Solutions • Responsive Service • Since 1907

**Catherine Reheis-Boyd**

President

March 4, 2016

Mr. Jim Nyarady  
Manager, Oil and Gas Section  
California Air Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Re: WSPA Comments on draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations (February 2016) – Supplemental Information

Dear Jim:

The Western States Petroleum Association (WSPA) is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and four other western states. WSPA appreciates this opportunity to provide the first round of comments on the proposed regulatory language published by the California Air Resources Board (ARB) on February 1, 2016 and presented by ARB staff on February 4, 2016 at the Public Workshop regarding ARB's draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations.

WSPA and WSPA member companies, as key stakeholders, have engaged with the ARB in the regulation development and implementation process. As the WSPA member companies each have existing air quality compliance programs, it is important that the final regulation be consistent with current and successful local, state, and federal air quality regulations.

The following attachments provide assessments of WSPA and WSPA member company concerns regarding the proposed regulatory language as a follow up to our initial letter addressing the proposed regulatory language submitted on February 18, 2016.

Thank you for your consideration of WSPA's comments. If you have any questions, please contact me at this office, or Jenifer Pitcher of my staff at (661)321-0884 or email [jpitcher@wspa.org](mailto:jpitcher@wspa.org).

Sincerely,



cc: Mr. Richard Corey, Executive Officer, Air Resources Board  
Mr. Ken Harris, Oil & Gas Supervisor, Division Oil, Gas & Geothermal Resources  
Jenifer Pitcher, WSPA