Western States Petroleum Association
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Catherine H. Reheis-Boyd
President

May 15, 2015

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

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 comments on the proposed regulatory language published by the California Air Resources Board (ARB) on April 22, 2015 and presented by ARB staff on April 27 and 29, 2015 at the Public Workshops 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 address some of the concerns of WSPA and WSPA member companies with regards to the proposed regulatory language. WSPA expects to submit further comments regarding the more complex issues presented by this regulation on May 22, 2015.

Thank you for your consideration of WSPA's comments. If you have any questions, please contact me at (916) 498-7752.

Sincerely,

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