Comment 1 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: David
Last Name: Campbell
Email Address: davidc@sjr.com
Affiliation: San Joaquin Refining Company

Subject: 95114 Hydrogen Production
Comment:

(e) Sampling Frequencies
(1)(A) Define atomic hydrogen content. We sample our natural gas feedstock once per month. Analysis includes hydrogen. Please define atomic hydrogen content. We are unfamiliar with this term.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-06-16 14:59:57

No Duplicates.

Comment 2 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Mark
Last Name: Krausse
Email Address: mckd@pge.com
Affiliation:

Subject: PGE MRR & COI Comments
Comment:

Attached is PG&E's MRR & COI Comments.

Attachment: www.arb.ca.gov/lists/com-attach/2-mrr-2014-ws-UyMHZlw4Aw8GYwNs.doc

Original File Name: PGE Comment MRR Final 061614 12pm.doc

Date and Time Comment Was Submitted: 2014-06-16 14:10:08

No Duplicates.

Comment 3 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Clare
Last Name: Breidenich
Email Address: cbreidenich@aciem.us
Affiliation: Western Power Trading Forum

Subject: Comments on informal proposed changes to the MRR
Comment:

The Western Power Trading Forum offers the following comment on staff proposed changes the Mandatory Reporting Regulation.

Clare Breidenich
WPTF, GHG Committee Director
1.206.697.4946

At the June 5th workshop on potential changes to the Mandatory Reporting Regulation, staff proposed modification to the regulation to provide clarification of the calculation by which importers would report the lesser of scheduled power or metered generation in an hour. WPTF supports inclusion of this calculation in the regulation, and the proposal that this calculation be required only from specified imports with an emission rate of zero, or resources that are eligible for the California Renewable Portfolio Standard program. However, WPTF believes that additional changes are needed:

- First, the Air Resources Board's practice, as explained at in an Electric Power Entities workshop in July 2013, has been to accept hourly allocation data in lieu of meter data for specified imports from the Mid-Columbia hydro-electric resources.
- Second, the 'lesser-of' calculation should not be required for out-of-state resources that are physically connected to the California Independent System Operator (CAISO) system and for which no NERC-tag is created. Electricity generated from these resources and injected into the CAISO is physically metered at a CAISO busbar. Thus, the quantity of generation will always match the quantity of power imported.

WPTF therefore requests CARB to amend the proposed changes to the lesser-of calculation to include these exceptions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-06-17 11:28:15

No Duplicates.

Comment 4 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Thomas
Last Name: Corr
Email Address: thomaspcorr@gmail.com
Affiliation: Noble Americas Energy Solutions LLC

Subject: Comments of Noble Americas Energy Solutions LLC
Comment:

Comments of Noble Americas Energy Solutions LLC

Attachment: www.arb.ca.gov/lists/com-attach/4-mrr-2014-ws-B2QFbAdrUG4BYgdp.pdf

Original File Name: Comments of Noble Solutions on the RPS Adjustment Final 17Jun2014.pdf

Date and Time Comment Was Submitted: 2014-06-17 15:46:37

No Duplicates.

Comment 5 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Tanya
Last Name: DeRivi
Email Address: tderivi@scppa.org
Affiliation: SCPPA

Subject: SCPPA Comments on Potential Amendments to the Mandatory Reporting Regulation
Comment:

Please find attached SCPPA's informal comments regarding ARB's proposed amendments to California's Mandatory Reporting Regulation (June 2, 2014 "Informal Discussion Draft").

Attachment: www.arb.ca.gov/lists/com-attach/5-mrr-2014-ws-UiEHYgFwVXYGYVIN.pdf

Original File Name: SCPPA MRR Informal Comments.pdf

Date and Time Comment Was Submitted: 2014-06-17 16:35:04

No Duplicates.

Comment 6 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Cindy
Last Name: Parsons
Email Address: cindy.parsons@ladwp.com
Affiliation: LADWP

Subject: LADWP Comments on June 2, 2014 MRR Discussion Draft
Comment:

See attached comments on Discussion Draft and workshop.

Attachment: www.arb.ca.gov/lists/com-attach/6-mrr-2014-ws-BmpcOwRhAiYGcAVa.pdf

Original File Name: LADWP Comments on June 2, 2014 MRR Discussion Draft.pdf

Date and Time Comment Was Submitted: 2014-06-17 16:35:36

No Duplicates.

Comment 7 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Ken
Last Name: Nold
Email Address: krnold@TID.org
Affiliation: Turlock Irrigation District ("TID")

Subject: TID's Comments on June 2nd Proposed Amendments to the MRR
Comment:

Dear Ms. Sahota,

Turlock Irrigation District (“TID”) submits the following informal comments regarding the California Air Resources Board (“ARB”) June 2, 2014 Proposed Amendments to the Mandatory Reporting Regulation (“June 2nd Discussion Draft”).

Sincerely,

Ken R. Nold
Turlock Irrigation District

Attachment: www.arb.ca.gov/lists/com-attach/7-mrr-2014-ws-UWBTYQQ1BWBRZldg.pdf

Original File Name: 140617_TID MRR Comments (00240797xBA8E1).pdf

Date and Time Comment Was Submitted: 2014-06-17 16:39:50

No Duplicates.

Comment 8 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: William
Last Name: Westerfield
Email Address: William.Westerfield@smud.org
Affiliation: Sacramento Municipal Utility District

Subject: SMUD's Comments on Potential Amendments to the Mandatory Reporting Regulation
Comment:

```
Attached please find the Sacramento Municipal Utility District's
Comments on Potential Amendments to the Mandatory Reporting
Regulation (June 2, 2014 "Informal Discussion Draft").
```

Attachment: www.arb.ca.gov/lists/com-attach/8-mrr-2014-ws-VjoHZAZgVCoEMAk5.pdf

Original File Name: LEG-2014-0492-SMUD-Comments-Amendments-MRR.pdf

Date and Time Comment Was Submitted: 2014-06-17 16:52:35

No Duplicates.

Comment 9 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Milan
Last Name: Steube
Email Address: milans@cox.net
Affiliation:

Subject: 95153(y)(2)
Comment:

I suggest an option be added to 95153(y)(2) to allow the use of EPA's Tier 3 methodology to calculate emissions from the combustion of non-pipeline quality natural gas at onshore petroleum and natural gas production facilities. The requirement to use the methodology currently specified in 95153(y)(2) is a result of CARB's adoption of EPA's prescribed Subpart W methodology at 98.233(z) for combustion equipment located on or associated with a single well pad (e.g., portable equipment used in association with well work or a boiler serving a single well pad) as the required methodology for all facility equipment combusting non-pipeline quality natural gas. But because CARB interprets the definition of an onshore petroleum and natural gas production facility more broadly than EPA does in its Subpart W regulation (i.e., CARB includes equipment associated with multiple well pads), the MRR requires use of the 95153(y)(2) methodology for sources that use the Tier 3 methodology for reporting to EPA. This causes additional work on the part of reporters as well as confusion and unnecessary inconsistencies in CARB vs. EPA reporting. In addition, it introduces uncertainty in the calculation by requiring the operator to specify a value of "n", i.e., the "fraction of gas combusted".

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-06-23 13:09:15

No Duplicates.

Comment 10 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Mike
Last Name: Wang
Email Address: mike@wspa.org
Affiliation: Western States Petroleum Assn.

Subject: WSPA Comments on the Proposed Changes to Mandatory Reporting Regulation
Comment:

Dear Mr. Cliff:

Please find the attached comments from the Western States Petroleum Association (WSPA) on the Proposed Changes to Mandatory Reporting and Cost of Implementation Regulations.

Should you have any questions, feel free to contact me on my cell 626-590-4905 or mike@wspa.org.

Thank you.
Mike Wang

Attachment: www.arb.ca.gov/lists/com-attach/10-mrr-2014-ws-USYFcFwtV2UDWlQ3.pdf

Original File Name: WSPA Comments on informal MRR-COI Regs 06232014B 1400.pdf

Date and Time Comment Was Submitted: 2014-06-23 15:03:43

No Duplicates.

Comment 11 for Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) - 1st Workshop.

First Name: Milan
Last Name: Steube
Email Address: milans@cox.net
Affiliation:

Subject: Sampling for Flash Liberation Analysis per 95153(v)(1)(A)(1)
Comment:

Clarification is needed regarding the appropriate location to obtain samples of crude oil and produced water to apply the Appendix B flash liberation methodology specified in 95153(v)(1)(A)(1) for calculating emissions from “crude oil, condensate, and produced water sent to storage tanks, ponds, and holding facilities”. As currently written, the method requires sampling from a “primary vessel located in a separator and tank system”. “Primary vessel” is defined in 95102 as "a separator or tank that receives crude oil, condensate, produced water, natural gas, or emulsion from one or more crude oil, condensate, or natural gas wells or field gathering systems”. This seems to leave considerable flexibility in the sampling location. Because the objective is to calculate emissions from “crude oil, condensate, and produced water sent to storage tanks, ponds, and holding facilities”, it seems appropriate to sample such liquids at the vessel immediately upstream of the storage tanks, ponds, or holding facilities. This is because the CO2 and CH4 dissolved in liquid discharged from such a vessel is the CO2 and CH4 potentially liberated from the liquid when it “flashes” in the storage tanks, ponds, and holding facilities. However, ARB staff has recently (verbally) advised samplers and operators that samples must be obtained from the FIRST (i.e., furthest upstream) vessel in a separator and tank system. Sampling at the furthest upstream vessel in a separator and tank system that consists of more than one separation vessel (e.g., a free water knockout followed by a heater treater) is likely to result in overstating emissions from the downstream storage tanks, ponds, and holding facilities. This is because some of the gas entrained in the liquids discharged from the upstream vessel is liberated in downstream vessels that operate at lower pressure and / or higher temperature and, therefore, is no longer dissolved in the liquid conveyed to the storage units. Rather, it is directed elsewhere in the facility (i.e., a fuel gas system, reinjection system, gas processing / sales system, or a flare) via a closed gas collection / conveyance system. This gas only contributes to facility emissions if it is then combusted as fuel gas or in a flare, leaks to atmosphere via equipment components in the gas collection / conveyance system, or is vented to atmosphere via a gas processing / sales system (e.g., an acid gas removal unit that vents CO2 to atmosphere). But the MRR requires these categories of emissions to be separately quantified and reported in accordance with other specified methodologies. So, requiring samples to be obtained at a point further upstream in the system from the vessel immediately upstream of the storage tanks, ponds, and holding facilities would likely result in emissions from the storage tanks, ponds, and holding facilities to be overstated.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-06-23 21:40:26

No Duplicates.

There are no comments posted to Public Workshop to Discuss Potential Revisions to GHG Mandatory Reporting Regulation (mrr-2014-ws) that were presented during the Workshop at this time.