

You state:

3. Additional Infrastructure Needs

*Because credits could be generated through the use of solar-generation of steam, electricity, and heat in oil fields, development of these types of facilities would be incented. Potential compliance responses associated with these methods could result in modifications to **existing crude production facilities** to accommodate solar, and wind electricity, heat, and/or steam generation. **These would be located within crude oil production facility sites.***

And

*These projects could include the modification of existing or new industrial facilities to capture CO2 emissions, along with construction of new infrastructure, **such as pipelines, wells, and other surface facilities within or near the emitting facility to enable the transport and injection of CO2 into a geological formation for sequestration.** The transport distances and pipeline construction requirements for the captured CO2 would vary depending on the locations of specific industrial sources of the captured CO2 and proposed underground formations, recognizing, however, that pipeline cost could reasonably limit the distance of CO2 transport. CCS would be required to be onsite at locations of oil or gas production facilities to obtain credits through the proposed LCFS.*

Comments:

LCFS ISOR report states:

Revised Annual Crude Average CI Calculation

*The crude lookup table lists field-specific CI values for crudes produced in and offshore of California. Regulated parties, however, are often supplied California crude in pipelines carrying crude blended from many fields. **Because neither staff nor the regulated parties have data that maps crude oil volumes from California fields to pipeline blends, it is not possible to match reported California crude names with CI values from the lookup table.***

Instead of using California crude names and volumes reported by refineries, staff proposes, in calculating the Annual Crude Average CI value, that volume contributions for California State fields will be based on oil production data from the California Department of Conservation, and volume contributions for California Federal Offshore fields will be based on oil production data from the Bureau of Safety and Environmental Enforcement.

Data that maps crude oil volumes from fields to pipeline blends is not available, and therefore, it is not possible to as accurately estimate CI values for California pipeline blends as for fields.

You have no basis in fact of the Crude Oil Volumes from oil field to pipeline and cannot determine any benefit.

Sequestration requires an Earthquake Fault Zone and municipal Circulation Elements are a necessity. Land Use Elements are also a consideration due to any proximity to population, housing and schools. The science for migration in rock formations is in the research stage, as we understand it.

There may be no benefit if the risk is too high.

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