

April 23, 2018

Mr. Sam Wade

Low Carbon Fuel Standard Program

California Air Resources Board

State of California

Re: **Proposed Revisions to LCFS Regulations**

Calgren Renewable Fuels and its affiliates appreciate this opportunity to comment on the proposed 2018 amendments to the Low Carbon Fuel Standard (LCFS). This program demonstrates California’s leadership in the fight for a better environment. We are committed to doing our part by developing, funding and operating innovative projects to help achieve LCFS goals.

Overall the proposed 2018 amendments to the LCFS regulations are well thought out and appropriate. However, we ask that consideration be given to the following changes:

1. **Definition of “Biomethane”** – We applaud ARB’s proposal to include within the definition of “biomethane” innovative processes such as the gasification of biomass to produce syngas and subsequent methylation to obtain methane of biological origin. However we caution against the proposed use of pipeline standards as a shortcut to defining biomethane. California’s current standards for injecting biomethane into common carrier gas pipelines are unnecessarily restrictive. In particular, the requirement that biomethane have an energy density of 990 Btu per standard cubic foot exceeds the requirement in almost every other state. More importantly, it exceeds the energy density required by natural gas vehicle engines and combustion turbines. To achieve this unnecessary standard, cleanup equipment must be oversized to allow for greater recycle rates. More recycle means more energy consumption, which is wasteful. ARB could do far better than adopt a biomethane definition that has an unnecessarily high carbon footprint. To the extent that ARB feels the need to refer to “biomethane” as meeting pipeline standards, it should retain a more pragmatic definition for “renewable natural gas.”
2. **Carbon Capture and Storage Protocol** – We agree that carbon capture and storage (CCS) has tremendous potential in the fight to reduce greenhouse gases. Nonetheless, we question the practicality of a 100-year monitoring requirement. Class VI wells at the federal level target “only” 50 years. If CCS is to be an effective tool, implementing programs must be manageable. Perhaps a compromise would be to insist upon lengthy monitoring but limit the period of carbon credit invalidation. Perhaps ARB’s proposed buffer account can come into play between the end of the invalidation period and the end of the monitoring period. As the saying goes, perfection should not be the enemy of the good.

Thank you for considering these comments. We commend the Board for its collective leadership and guidance regarding this landmark program.

Sincerely,

Lyle Schlyer, President

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