Jim Verburg
Director, Fuels

May 10, 2022

Submitted via upload to:
https://www.arb.ca.gov/lispub/comm2/iframe_bcsubform.php?listname=opgee-general-ws&_ga=2.140302003.1410982933.1651765416-237475923.1631295388Ms

Ms. Cheryl Laskowski
Chief, Transportation Fuels Branch
California Air Resources Board
1001 I Street,
Sacramento, CA 95814

Re: WSPA Comments on April 26, 2022 CARB OPGEE Model Workshop

Dear Ms. Laskowski:

The Western States Petroleum Association (WSPA) appreciates the opportunity to comment on the California Air Resources Board (CARB) Public Workshop on Revisions to the Oil Production Greenhouse Gas Emissions Estimator (OPGEE) Model, held on April 26, 2022. WSPA is a non-profit trade association that represents companies that export for, produce, refine, transport and market petroleum, petroleum products, natural gas, and other energy supplies in California and four other western states, and has been an active participant in air quality planning issues for over 30 years.

Major Stakeholder Comments from 2021 OPGEE Workshop (Slide 8)

In response to stakeholder comments from the last workshop, CARB staff indicated that operator data or Mandatory Greenhouse Gas Reporting Regulation (MRR) data were not useful in validating OPGEE model results. Specially, CARB staff indicated that the manner data is collected for MRR. WSPA disagrees with this viewpoint. WSPA believes that detailed data submitted to CARB under the MRR program exists that can be helpful in verifying the accuracy and validity of OPGEE model results[1]. WSPA requests that CARB staff coordinate with the CARB MRR staff and revisit this stakeholder comment.

2010 Baseline Crude Average CI (Slide 16)

CARB staff is recommending a 2010 baseline crude average, based on OPGEE v3.0b of 12.58 gCO_2e/MJ (0.80 gCO_2e/MJ increase from OPGEE v2.0c). WSPA requests that CARB staff also update the tolerance used to determine the applicability of incremental deficits. Instead of the current 0.10 gCO_2e/MJ tolerance above the crude carbon intensity (CI) baseline per §95489(a), CARB should use a higher tolerance, such as 1.00 gCO_2e/MJ above the crude CI baseline, to trigger incremental deficits. The higher tolerance is justified as the OPGEE model accuracy is well beyond the 0.10 gCO_2e/MJ tolerance. Further, the crude oil volumes by field processed each year carry an uncertainty and therefore an additional error to the average crude CI, which justifies using a tolerance of at least 1.00 gCO_2e/MJ for the applicability of the incremental deficits.

[1] Mandatory GHG reporting required under California Title 17.Division 3.Chapter 1.Subchapter 10.Article 2.Subarticle 2

Notable Changes Since v3.0a: Error Fixes & Updates (Slide 20)

CARB staff indicates that OPGEE v3.0b incorporates updated venting and fugitive emission factors based on latest updates in Rutherford et.al.[2] In reviewing that reference document, it is not apparent that the updated venting and fugitive emission factors are California-specific or even consider California oil field data. WSPA is concerned that the OPGEE model does not represent current California oil field operations which may lead to overestimates of CI values when compared to imported crude. WSPA requests that CARB staff provide much more transparency as to how California crude is represented in the OPGEE model.

Thank you for consideration of our comments in this letter. If you have any immediate questions, please feel free to contact me at (360) 296-0692 or via e-mail at jverburg@wspa.org.

Sincerely,

James Verburg
Director, Fuels
WSPA

[2] Jeffrey S. Rutherford, Evan D. Sherwin, Arvind P. Ravikumar, Garvin A. Heath, Jacob Englander, Daniel Cooley, David Lyon, Mark Omara, Quinn Langfitt & Adam R. Brandt. "Closing the methane gap in US oil and natural gas production emissions inventories", August 5, 2021.