February 20, 2024

Submitted electronically via ww2.arb.ca.gov

Chair Liane M. Randolph and
Members of the Board
California Air Resources Board
1001 I Street
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RE: Proposed 2024 Low Carbon Fuel Standard Amendments

Dear Chair Randolph and Members of the Board:

California Resources Corporation ("CRC") appreciates the opportunity to comment on the California Air Resources Board's ("CARB" or "the Board") proposed 2024 amendments to the Low Carbon Fuel Standard ("LCFS") published December 19, 2023 (the "Proposed Rules").[1] As explained below, in addition to other aspects of the proposal, CRC believes that the Proposed Rules approach to LCFS credit generation for hydrogen projects is not consistent with CARB's December 2022 Scoping Plan (the "2022 Scoping Plan"), and, unless CARB takes steps to revise its proposal, California's nascent low carbon hydrogen production industry will lack vital incentives necessary for the development of California's low carbon economy.

About CRC and Carbon TerraVault Holdings, LLC

California Resources Corporation is an independent energy and carbon management company committed to the energy transition. CRC has some of the lowest carbon intensity production in the US and we are focused on maximizing the value of our land, mineral and technical resources for decarbonization by developing carbon capture and storage ("CCS") and other emissions reducing projects.

Our core activities involve exploration, production, gathering, processing, and marketing of crude oil, natural gas, and natural gas liquids. We leverage advanced technologies extensively to enhance safety and boost production efficiency across our expansive mineral acreage and diverse portfolio. These cutting-edge technologies allow us to increase production while minimizing the environmental footprint of our oil and gas development operations. For more information about CRC, please visit www.crc.com.

Carbon TerraVault Holdings, LLC ("CTV"), a subsidiary of CRC, is developing services that include the capture, transport and storage of carbon dioxide for its customers. CTV is engaged in a series of CCS projects that inject CO_2 captured from industrial sources into depleted

[1] California Air Resources Board, Proposed LCFS Amendments, https://ww2.arb.ca.gov/rulemaking/2024/lcfs2024.

underground reservoirs and permanently store CO_2 deep underground. For more information about CTV, please visit www.carbonterravault.com.

CTV is involved in several green energy initiatives. These include the Grannus Ammonia and Hydrogen Project, which will sequester 370,000 metric tons ("MT") of CO_2 annually and produce clean ammonia and hydrogen in Northern California. The project aims to be California's first clean ammonia and hydrogen facility producing 150,000 MT per annum of clean ammonia and 10,000 MT per annum of clean hydrogen. The Elk Hills Hydrogen Project, in collaboration with Lone Cypress Energy Services, will sequester 205,000 MT of CO_2 per year and produce 65 tons per day of hydrogen from a new hydrogen plant.[2,3] CTV has an agreement to sequester 150,000 MT per annum with NLC Energy, who plans to build a new facility expected to produce up to 7,000 MMBtu per day of RNG from biomass and other agricultural waste feedstock. The Verde Clean Fuels renewable gasoline production facility plans to partner with CTV to sequester 100,000 MT per annum and will utilize an innovative and proprietary liquid fuels technology to produce renewable and lower-carbon gasoline and other liquid fuels from feedstocks such as biomass and agricultural waste. Inentec plans to build a new renewable dimethyl ether (rDME) production facility, with CTV sequestering 100,000 MT per annum and Inentec producing 80-100 tons per day of rDME from biomass and other wastes materials. Lastly, the Yosemite Hydrogen Facility, in partnership with Yosemite Clean Energy, will sequester 40,000 MT of CO_2 per year from a new hydrogen plant expected to produce 24,000 kilograms per day of hydrogen with forest biomass feedstock. These projects contribute to our sustainability goals to reduce carbon emissions and promote clean energy.

About Carbon TerraVault Joint Venture

Carbon TerraVault Joint Venture ("CTV JV") is a carbon management partnership focused on carbon capture and sequestration development, and was formed between Carbon TerraVault, a subsidiary of CRC, and Brookfield Renewable. The CTV JV develops both infrastructure and storage assets required for CCS development in California. CRC owns 51% of the CTV JV with Brookfield Renewable owning the remaining 49% interest.

Proposed Recommendations

As a California-based company committed to the energy transition, CRC supports CARB's overall goal of achieving carbon neutrality by 2045 and reducing greenhouse gas emissions by 2045 to a level that is 85% below 1990 levels. In its Statement of Reasons for the Proposed Rules, CARB stated that "[m]eeting this goal will require the deployment of greenhouse gas emission reduction strategies ***at an unprecedented scale and pace***."[4] However, we are concerned that many aspects of the Proposed Rules unnecessarily restrict or prohibit established and proven strategies for reducing GHG emissions in connection with the production of low carbon intensity ("CI")

[2] Second Quarter 2023 Update, California Resources Corporation (July. 31, 2023).
[3] CRC expects that the Lone Cypress Hydrogen Project will utilize a blended feedstock consisting of natural gas and RNG, subject to the availability of RNG.
[4] 2024 LCFS Amendments Staff Report: Initial Statement of Reasons at 4 (Dec. 2023) [hereinafter "Initial Statement of Reasons"] (emphasis added).

hydrogen from generating LCFS credits. In particular, the Proposed Rules as written would exclude low-CI hydrogen with CCS (production of hydrogen utilizing CCS to capture GHG emissions) from generating LCFS credits. The Proposed Rules seemingly only provide for LCFS credits to be generated from hydrogen produced using (1) electricity generated from renewable power sources and (2) renewable natural gas ("RNG") as a feedstock. This proposal is inconsistent with the CARB 2022 Scoping Plan and will ultimately frustrate the deployment of low carbon hydrogen projects in California.

As discussed in greater length below, we respectfully request that prior to finalization of the Proposed Rules, CARB:

- Revise the definition of the term "renewable hydrogen" in the proposed LCFS amendments to allow for the use of CCS to be consistent with the 2022 Scoping Plan;
- Expand the LCFS crediting requirements for hydrogen fueling infrastructure to explicitly acknowledge that low-CI hydrogen with CCS can be used to meet the carbon intensity targets;
- Revise and broaden the refinery crediting program to allow for the use of CCS;
- Clarify that book-and-claim accounting can be used to support LCFS credit generation when RNG is used to generate electricity utilized for hydrogen production and direct air capture projects; and
- Reverse the proposed crediting changes for solar innovative crude projects.

These four requests largely stem from regulatory inconsistencies and counterproductive consequences associated with the Proposed Rules, including 1) conflicts between the amendments and CARB's 2022 Scoping Plan, 2) negative impacts to California's climate goals, and 3) harmful financial effects, including risk of stranding assets.

California Resource Corporation's Concerns with the Proposed LCFS Amendments

1. The Proposal is Not Consistent with CARB's 2022 Scoping Plan and Will Frustrate Deployment of Low Carbon Hydrogen

Assembly Bill ("AB") 32 requires CARB to develop a Scoping Plan which lays out California's strategy for meeting the state's climate goals and update the Scoping Plan every five years.[5] The 2022 Scoping Plan provides a detailed pathway to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85% below 1990 levels no later than 2045.

Hydrogen production plays a critical role in meeting these goals per the 2022 Scoping Plan. In order to achieve these ambitious climate targets, the 2022 Scoping Plan recognized that ***1,700 times*** the current hydrogen supply will be required by 2045.[6] AB 32 requires that any CARB

[5] Cal. Code Regs. Title 17, § 38561.(a)-(h) (2023).
[6] California Air Resources Board, *2022 Scoping Plan for Achieving Carbon Neutrality*, at 8 (Dec. 2022) [hereinafter "CARB 2022 Scoping Plan"].

scoping plan embrace "technologically feasible and cost-effective reductions in GHG emissions."[7] The 2022 Scoping Plan follows that statutory directive, but the Proposed Rules do not.

The massive scaling of low carbon hydrogen projects necessary to meet the goals of the 2022 Scoping Plan requires an "all of the above" approach to low carbon hydrogen production and ensuring that sufficient supportive financial incentives are in place. LCFS credits represent a potentially critical financial incentive for low or zero carbon hydrogen projects. However, based on how CARB proposes to define "renewable electricity," hydrogen production would generally only be eligible to generate LCFS credits if it involves: (1) the electrolysis of water or aqueous solutions using renewable electricity; (2) catalytic cracking, oxidation or steam methane reforming of biomethane or other renewable hydrocarbons; or (3) thermochemical conversion of biomass.[8] This narrow definition ignores, and if adopted as proposed will only serve to disincentivize, the entire low-CI hydrogen industry—a nascent but proven technology being implemented at scale in California by CRC. In light of the 1,700-fold expansion in the state's hydrogen supply called for by the 2022 Scoping Plan, CRC believes that CARB should be encouraging *all forms* of low carbon hydrogen production.

As highlighted above, the 2022 Scoping Plan calls for a flexible approach to supporting the development of low carbon hydrogen.[9] Specifically, the Plan makes the following key references to hydrogen and CCS:

> "For the purposes of this Scoping Plan, 'renewable hydrogen' and 'green hydrogen' are interchangeable and are not limited to only electrolytic hydrogen produced from renewables." (page 26)
>
> "CCS can support hydrogen production until such time as there is sufficient renewable power for electrolysis and an abundant water source." (page 86)
>
> "If steam methane reformation is paired with CCS, the hydrogen produced could potentially be low carbon." (page 88)

These references were included in the final adopted version of the 2022 Scoping Plan despite multiple commenters calling on CARB to explicitly exclude CCS from its definition of hydrogen production eligible to generate LCFS credits. Adhering to the 2022 Scoping Plan requirements outlined in AB 32, CARB refused to take such a narrow approach and built flexibility into the final 2022 Scoping Plan. But merely a year later, in December 2023, CARB published the draft LCFS amendments that seem to take the opposite approach in contrast to that of the 2022 Scoping Plan. This change in the Board's direction seems arbitrary and capricious in light of the rulemaking record.

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[7] AB 32 § 38561.(a) "[CARB] shall prepare and approve a scoping plan, as that term is understood by the state board, for achieving the **maximum technologically feasible and cost-effective reductions** in greenhouse gas emissions [emphasis added]."

[8] 2024 LCFS Amendments, Proposed Regulation Order, 17 C.C.R. § 95481.(a).

[9] CARB 2022 Scoping Plan at 6.

This abrupt change in CARB's stance towards low-CI hydrogen with CCS is further evidenced in the Board's responses to public comments on the draft 2022 Scoping Plan. When a public commenter called for CARB to only support electrolytic hydrogen generation via renewable electricity, the Board responded by stating that:

> [t]he 2022 Scoping Plan does not prescribe the energy source to produce hydrogen, and therefore, steam methane reformation paired with CCS could be considered in the near term to ensure a rapid transition to hydrogen and increase hydrogen availability until such time as electrolysis with renewables and biomass-based hydrogen can meet the ongoing need.[10]

CARB further acknowledged that because "the build-out [of renewable power generation] takes time and is additive to the growth in demand growth associated with electrification across the economy, the state needs to keep options open for other methods to produce zero carbon hydrogen at the scale needed to meet the projected demand."[11] The Proposed Rules, however, do not embrace the approach called for in the 2022 Scoping Plan and seemingly only contemplate a role for CCS in hydrogen production when RNG is used as a feedstock.[12] Restricting LCFS crediting to hydrogen produced from CCS only when RNG is also used does not keep California's "options open."

The Proposed Rules ignore the technical realities associated with the time to scale the deployment of hydrogen solely produced from renewable electricity and other factors discussed below that may limit the availability of RNG as a feedstock. In this interim period, low-CI hydrogen with CCS is the only proven and scalable technology capable of meeting the demands of California's expanding low carbon economy.[13] Even CARB itself has acknowledged, in its 2022 Scoping Plan, that "[t]here is a high degree of uncertainty around the availability of solar to support both electrification of existing sectors and the production of hydrogen through electrolysis."[14] Given this uncertainty, we are concerned that CARB is playing a zero-sum game by directly linking hydrogen generation LCFS credits largely to renewable power generation. Instead of devoting renewable power supplies to meet other grid demands, these LCFS amendments would incentivize more of this zero-carbon electricity to be devoted to hydrogen generation via electrolysis. This unnecessary competition over scarce renewable energy supplies can be avoided by revising the LCFS amendments to incentivize low-CI hydrogen with CCS as an interim solution while these other hydrogen generation technologies develop.

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[10] CARB 2022 Scoping Plan Response to Comments, Appendix B at 57.
[11] *Id.*
[12] While the 2022 Scoping Plan used the example of CCS with hydrogen production using RNG as a feedstock as an example of low carbon hydrogen production, *see id.*, nothing in the 2022 Scoping Plan suggested that CARB viewed this as the only pathway for CCS to support low carbon hydrogen production and LCFS credit generation.
[13] Bracci, J., et al., *Fueling the California Mobility Market with Hydrogen from Natural Gas plus Carbon Capture and Storage, Stanford Natural Gas Initiative and Stanford Center for Carbon Storage*, May 2022, at 41 ("near-term techno-economic models still point to SMR-CCS being the cheaper hydrogen generation pathway to kickstart a clean hydrogen economy in California") [hereinafter "SCCS Study"].
[14] CARB 2022 Scoping Plan at 88.

Moreover, CARB may be overestimating the availability of RNG for use in hydrogen production within California. Separate from the provisions related to hydrogen, the Proposed Rules would also effectively end LCFS crediting for biomethane projects after 2040. Given that the biomethane crediting pathway is widely used to support the development of RNG projects, this change will remove the primary financial incentive for new RNG projects in California and for producers to send RNG to California. This is because LCFS credits are critical to making RNG projects competitive with fossil gas given the comparatively low value of environmental credits available under the federal Renewable Fuel Standard ("RFS") and other state low carbon fuel programs. The Proposed Rule's inclusion of a limited pathway for crediting projects using RNG as a feedstock to produce hydrogen until only 2045 is unlikely to be enough to support the volumes of RNG needed meet the 2022 Scoping Plan's goals for low-CI hydrogen. Removing biomethane crediting from the LCFS may result in producers sending RNG to Oregon and Washington to capture more value under those state low carbon fuel programs. In addition, demand for RNG outside of California is only expected to grow over the next several years, with New Mexico recently enacting a low carbon fuel standard and the U.S. Environmental Protection Agency's expected eventual finalization of rules allowing RNG used in electricity generation to generate credits under the RFS. This will inevitably increase demand for RNG for non-hydrogen uses outside of California and could accordingly result in RNG supply shortfalls within the state. CARB's assumption that sufficient RNG may be available as a feedstock for low carbon hydrogen production does not appear to consider this factor.

The LCFS can play a critical support role in the development of California's low carbon hydrogen economy. For example, strong market signals from the LCFS have supported increased production and use of biodiesel and other low carbon fuels.[15] Even regarding CCS, a recent May 2022 study from the Stanford Center for Carbon Storage found that "LCFS is the single largest financial incentive for eligible CCS projects in California."[16] But rather than send strong market signals or incentives in support of California's growing low carbon hydrogen industry, the Proposed Rules send the opposite signal, likely harming both the low carbon hydrogen and CCS industries. By picking winners and losers at such an early stage in the energy transition, CARB is abandoning the technology-neutral approach outlined in its own 2022 Scoping Plan where it stated that "[t]he challenge before us requires us to keep all tools on the table."[17] We believe that CARB should adopt this latter approach and reverse the restrictive course proposed in the LCFS amendments. In particular, as part of this reversal, CARB needs to revise its proposal so that blue hydrogen projects are eligible to receive additional LCFS credit generating opportunities.

2. Impact to State Climate Goals

The California Climate Crisis Act (AB 1279) sets an ambitious goal, requiring the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and thereafter achieve and maintain net negative GHG emissions. CCS is critical to this endeavor; it is, importantly, a *viable* option to reduce emissions from sectors that are key contributors to California's total

[15] CARB 2022 Scoping Plan at 191.
[16] SCCS Study at 32.
[17] CARB 2022 Scoping Plan at 11.

emissions.[18] It is also a "critical enabler" of various carbon dioxide removal pathways and a "strong complement" to other decarbonization strategies.[19] In California specifically, CCS has the potential to play "a key role" in the removal of unabated carbon emissions, with potential geologic sequestration capacity in the state estimated to be between 35 to 425 gigatons of CO_2e in saline aquifers and 5 gigatons of CO_2e in the largest oil and gas basins.[20] This could provide storage capacity for up to 1,000 years.[21]

CARB itself has acknowledged the essential role that CCS must play in achieving California's ambitious climate goals. In fact, CARB has stated that "there is no path to carbon neutrality without carbon removal and sequestration," as indicated not just by the 2022 Scoping Plan Update but also by the IPCC's Climate Change 2022: Mitigation of Climate Change report.[22] The 2022 Scoping Plan is the main regulatory document governing how CARB will approach progress toward, and the meeting of, the state's ambitious climate aims. Integral to such progress is the development of, and support of, CCS projects—without this tool, carbon neutrality will remain an illusory hope. CARB's LCFS Proposed Rules, then, are entirely inconsistent with the state's 2022 Scoping Plan, completely disregarding prior acknowledgement of the absolute necessity of CCS. CARB must return to embracing CCS as an integral part of its strategy to achieve the state's targets.

CCS represents a both foundational building block for meeting California's climate goals and acting as a bridge to support low carbon hydrogen production until sufficient renewable power generation capacity exists to actually allow for large-scale hydrogen production using only renewable electricity. Even if, as CARB has recognized, the transportation sector is headed toward electrification, low carbon hydrogen and CCS will be a key component in any strategy to decarbonize hard-to-abate industries, such as heavy manufacturing (*e.g.*, steel and cement).[23] The role of low-CI hydrogen with CCS as a necessary bridge to 100% renewable-derived hydrogen will be thwarted without the right support under the LCFS.

3. Financial Impacts

Notwithstanding the critical role of low-CI hydrogen with CCS in meeting the state's ambitious climate goals, the Proposed Rules fail to account for the significant financial benefits CCS can provide. For example, it is estimated that the community benefits from direct air capture CCS projects *alone* in Kern County, California, could produce $68 million a year in county property tax revenue, $25 million to surrounding cities, and a total of 23,000 jobs.[24] And, in a study

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[18] *See* Energy Future Initiatives, Standard Precourt Institute for Energy & Stanford Earth, *An Action Plan for Carbon Capture and Storage in California: Opportunities, Challenges, and Solutions*, at S-1 (Oct. 2020) [hereinafter "Action Plan"].
[19] *Id.* at S-2.
[20] *See* California Air Resources Board, *Achieving Carbon Neutrality in California,* at 65 (Oct. 2020).
[21] *See* Action Plan at S-6.
[22] California Air Resources Board, *Carbon Sequestration: Carbon Capture, Removal, Utilization, and Storage - About Webpage* (last visited Feb. 12, 2024), http://tinyurl.com/r46r5ucf.
[23] *See* CARB 2022 Scoping Plan, Table 2-1, at 72-79.
[24] *See* Ferrell, Jake, *Carbon Removal in California: Striving Toward Environmental Justice in the Central Valley*, American University Research Center (Dec. 2023).

from Louisiana State University, the development of a CCS hub in the region was estimated to result in thousands of jobs and several hundred million dollars in potential earnings for workers in the Gulf Coast region over a five-year construction period.[25] However, such financial benefits for state and local governments can only be realized if the right incentives are in place. To that end, CARB should ensure that any final amendments to the LCFS properly incentivize the development of CCS.

For California to be a leader in the CCS industry, and to capitalize on the substantial financial benefits that CCS can bring, CARB should use the LCFS to incentivize additional low carbon hydrogen production. LCFS credits are critical here.[26] To mitigate against the expenses of production, low carbon hydrogen developers have come to rely on stacking multiple incentives, particularly following the passing of the Inflation Reduction Act in August 2022.[27] For CCS projects, the stacking of incentives relies not only on tax credits but also the LCFS credit.[28] However, by adopting the restrictive approach proposed in the LCFS amendments, CCS projects face undue capital and economic uncertainty, stymying development and, ultimately, the achievement of energy decarbonization goals. Moreover, this unnecessary barrier to market and develop CCS projects will likely result in stranded assets, the very idea of which CARB has strongly rejected in the 2022 Scoping Plan[29] and acknowledged it must avoid in the LCFS Proposed Rules themselves.[30] It is critical that CARB revise its approach to ensure that low carbon hydrogen production is economical and financially viable.

4. Book-and-Claim Accounting and Crediting Opportunities for Low-Carbon Electricity and Hydrogen Production and Direct Air Capture ("DAC")

CRC also requests that CARB clarify the book-and-claim accounting provisions in the Proposed Rules to allow for LCFS credit generation when low-CI electricity produced from biomethane is then used to support DAC or hydrogen production. As an operator, we would like the ability to receive credits for any quantities of low-CI electricity produced onsite using biomethane feedstocks, but we anticipate these initial projects to be small in scale. As a result, our

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[25] *See* Dismukes, David E., et al., *The Economic Implications of Carbon Capture and Sequestration for the Gulf Coast Economy,* Louisiana State University Center for Energy Studies, at 4 (Mar. 2023).
[26] *See supra* n.15 and n.16.
[27] *See* Hedreen, Siri, *Stacked Tax Credits Make Green Hydrogen Economic for First Time in US*, S&P Global Market Intelligence Webpage (last visited Feb. 12, 2024), http://tinyurl.com/ycxf5se3.
[28] *See* Littlefield, Anna, et al., *Decarbonization of Ethanol: Pathways to Monetization Series Part One: Stacking 45Q with Voluntary Carbon Markets*, Colorado School of Mines: Payne Institute for Public Policy (Dec. 2023); *see also* SCCS Study at 2 ("These [federal] tax credits, combined with Low Carbon Fuel Standard incentives, offer a strong—and urgent—business case for commercial scale blue hydrogen projects in California."); SCCS Study at 42 ("Existing federal and state policies—the 45Q and LCFS—are key in making blue hydrogen more cost-competitive[.]").
[29] *Id*. at 9 "We must avoid making choices that will lead to stranded assets and incorporate new technologies that emerge over time."
[30] With respect to biomethane, CARB acknowledges that, for the fuel to transition to more sectors in the long term, "the existing market signals will need to transition accordingly to avoid stranded assets and the closure of methane capture projects." Initial Statement of Reasons at 30. The same idea is applicable to CCS projects if projects are forced to cease mid-development due to the lack of financial incentives, support and access to capital.

low carbon operations would benefit from the ability to directly offset purchased quantities of biomethane used onsite with the corresponding electricity generation credits. If CARB believes that the Proposed Rules already allow for such a crediting scheme, we request CARB issue a statement confirming that this is a valid approach.

5. Innovative Crude LCFS Credit Proposed Changes

$$Credits_{Innov}(MT) = \sout{511}314 \times \frac{E_{electricity} \times f_{renew}}{V_{crudeproduced}} \times V_{Innov} \times C$$

Figure 1: Proposed LCFS Credits Equation for Innovative Crude Projects.

The Proposed Rules include a substantial reduction in the credits awarded to innovative crude oil produced or transported using solar or wind-based electricity. As highlighted in **Figure 1**, this reduction stems from a change in the coefficient (*i.e.*, the displacement emission factor) in the equation listed above (replacing "511" with "314") which will reduce awarded credits by approximately 40%. CRC notes that this crediting pathway has resulted in at least seventeen innovative crude oil projects to date across the state. Furthermore, our operating experience has shown that solar electricity production provides one of the best ways as an operator to directly reduce our Scope 2 GHG emissions. Despite these successful emission reductions, CARB's proposed changes to this crediting equation will impact funding investment decisions for projects currently in development. Worse still, operating projects that were financially justified based on the previous crediting equation risk becoming stranded assets if their LCFS credits are taken away.

We request CARB reverse this proposed change and keep the current displacement emission factor of 511 gCO_2e/kWh. In the alternative, we request that the Proposed Rules be revised to more explicitly state that projects that have already been approved to generate LCFS credits in this manner be allowed to keep using the existing crediting equation with a potential grace period for projects currently under development. Absent these requested revisions, the arbitrary changes to the innovative crude pathway crediting scheme sets a precedent that LCFS credits cannot be relied upon when justifying long-term project investment decisions. In turn, this could impact other LCFS crediting programs—beyond just the innovative crude pathway—by creating hesitation among investors instead of incentivizing new projects and developments to reduce emissions.

Conclusion

As more fully explained above, CRC recommends CARB revisit various of its proposed amendments to the LCFS program with respect to low-CI hydrogen with CCS, in particular. Revisions to the Proposed Rules are necessary to ensure consistency with the 2022 Scoping Plan and, importantly, to recognize the importance of blue hydrogen in meeting the state's ambitious climate goals. To that end, revisions to the definition of the term "renewable hydrogen" are required, alongside the expansion and broadening of LCFS crediting programs and requirements, among others, as detailed above.

CRC appreciates the opportunity to comment on the proposed 2024 LCFS amendments. We thank the Chair and CARB for its consideration and look forward to continued dialogue.

Respectfully submitted,

Chris Gould

Chris Gould
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California Resources Corporation