

Pacific Energy appreciates the opportunity to submit this comment today, as we were not able to submit it previously.

Pacific Energy Resources LTD is the owner and operator of three offshore oil production platforms located in federal waters, 9 miles offshore from Huntington Beach, California. While we are subject to various SCAQMD rules and regulations promulgated by U.S. Environmental Protection Agency under 40 CFR Part 55, we are not subject to California Air Resources Board regulations that do not have federal equivalent regulations. We therefore are of the understanding that AB32 mandatory greenhouse gas emission reporting does not apply to our offshore facilities. We are tracking all of our fuel usage under the SCAQMD RECLAIM program and have the data to easily calculate CO2 and other emissions, however we do not plan to formally report the carbon emissions, as would be required under AB32.

If any information becomes available that would change our understanding of this applicability issue, please let me know.

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