From:	PETERS Bill N.
To:	"Duffy, James@ARB"; "abrandt@stanford.edu"
Cc:	WIND Cory Ann
Subject:	Applying the OPGEE analysis to Oregon"s 2018 LCFS rulemaking
Date:	Thursday, May 10, 2018 17:05:26
Attachments:	2018 opgee analysis.xlsx

Hi Jim and Adam,

I was wondering if we could schedule a conference call in the next week or two to go over some questions we have about applying the OPGEE 2.0 analysis to our current rulemaking.

Basically, we're trying to get the best data we can on the source of the crude oils going into the Washington and Utah refineries that feed Oregon, and then estimate the carbon intensity based on that. Since these refineries are outside of our jurisdiction, we don't have oil field/MCON-level reporting of their crudes, so I'm working towards some reasonable estimates here. For our current rule we used the analysis (page 22) that Washington State had done by Lifecycle Associates and others for their pre-LCFS policy work back in 2014.

Based on our preliminary analysis, some of the questions or issues we want to get some advice on are:

1. Is possible to get the Canadian crudes split out by conventional versus oil sands upgraded to syncrudes? The Washington data we have is split out that way so a straight average of the CIs based on type may be the best approach. For the rough/quick version of the analysis, which is attached, I just grouped the under 14gCO2e/MJ CI crudes as conventional and the over 14 CI crudes as syncrude. Alternatively, I'd need to use the EIA imports data and figure out a way to fingerprint the fields based on the API gravity and sulfur content – if you know of a good dataset that I can use to do that I'm all ears.
2. Is there a better way to estimate the carbon intensity per country of origin than just a straight average of the carbon intensity of their oil fields?
3. Are there arguments for assuming a more conservative (higher CI) assumption than a straight average for all of the oil fields in a country or state?

We get about 90% of our fuel from Washington, and the remaining 10% of our fuel from Utah. The attached spreadsheet has the estimate for Washington, but the Utah data I've have only identifies the origin of about ~60% of their crude oil inputs so I'm still thinking about that estimate's methodology.

Let me know if a conference call would work in the next two weeks – maybe next Thursday or the middle of the week of the 21st-25th?

My best,
--Bill

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