BY ELECTRONIC MAIL

6 June 2017

Jack Broadbent, Air Pollution Control Officer Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco CA 94105



Attention: Victor Douglas, Eric Stevenson, and Greg Nudd

Supplemental Technical Comment on the Refinery Emission Caps Rule 12-16: Additional Evidence Supporting the Effectiveness of GHG Limit "Caps"

Mssrs. Broadbent, Douglas, Stevenson and Nudd,

Oil industry comments at the 31 May 2017 hearing suggested that preventing oil refinery emissions from increasing will restrict California fuel supplies, increasing fuel imports into California with their associated GHG emissions, and threatening existing refinery jobs. The industry comments ignore authoritative data that disprove these assertions. The data show statewide gasoline demand peaked in 2007, refiners here make far more fuel than California needs, and their excess production for export is a major—and growing—emitter now.

California refinery gasoline and diesel (distillate) production data reported by the State Energy Commission, and California gasoline and distillate diesel demand data reported by the State Bureau of Equalization, are appended hereto as Table KR-A. West Coast gasoline and distillate demand, import, and export data reported by the U.S. Energy Information Administration are appended hereto as Table KR-B. An estimate of emissions associated with refining for export, based on these data and emission factors from the Air Resources Board and peer reviewed literature, is appended hereto as Table KR-C.

California gasoline, West Coast gasoline, and West Coast distillate demand peaked in 2007 and, in each case, remains below its 12-month average peak level. Tables KR-A, KR-B.

Since its outsized hydrocracking capacity (Att. KR-2) allows the West Coast oil refining industry to "swing" between gasoline and distillate production, and its export markets buy more distillate than gasoline (Table KR-B), a proper supply/demand analysis should account for supply and demand of gasoline and distillate combined. California refinery production exceeded California demand for gasoline and distillate combined by 186,000–277,000 barrels per day, or 14–20 percent of total in-state production, from 2008 through February 2017. Table KR-A; 12-month rolling average. Bay Area refiners make more gasoline and distillate than their in-state market consumes, and sell the excess in other states and nations. *See* attachments KR-7, 8.

Supplemental Comment on Rule 12-16 6 June 2017 Page two

California refiners drive a West Coast-wide gasoline and diesel production excess, which is exported to other nations, thereby driving an enormous and increasing excess GHG footprint globally. The West Coast has been a net exporter of gasoline and distillate since 2008. <u>See</u> Table KR-B. Twelve-month average net exports from the West Coast increased to approximately 129,000 barrels/day in April 2014 for distillate and to approximately 53,600 barrels/day in January 2017 for gasoline. <u>Id</u>. West Coast exports of pet coke—a byproduct of refining lower quality oil—are cumulatively larger still, averaging approximately 110,000 barrels/day from 2006 to March 2017 and increasing by approximately 25,000 barrels/day on average after 2011. <u>Id</u>.

Estimated cumulative GHG emissions associated with this production for export total approximately 440 million metric tons of CO_2 e from September 2008 through March 2017. See Table KR-C. This 440 megaton estimate represents only the emissions associated with making and burning those West Coast refinery products that were exported. <u>Id</u>. Annual emissions associated with these exports increased at an average rate of ≈ 3.59 percent/year during this period. <u>Id</u>. A significant portion (> 11%) of these emissions was caused by the increased refinery fuel combustion and (especially) the increased coke by-production resulting from refining a relatively lower-quality, more carbon-intensive crude feed than the average U.S. crude feed. <u>See</u> also Att. KR-2.

Bay Area refiners exported most of the gasoline and distillate exported by California refiners in 2013 (Att. KR-8), exported more refined product as measured by dollar value than any other West Coast refining center in 2014 (Att. KR-7), and accounted for 96% of total California gasoline exports in the first eight months of 2016 (G. Schremp, 19 Oct. 2016 CEC presentation to BAAQMD).

These data demonstrate that excess production for export—the opposite of the shortage forcing net imports that the refiners falsely imply—is increasing emissions associated with Bay Area oil refining now. The data further show that from 2011–2015, a period when each covered facility emitted at levels below the proposed annual emission caps, statewide refinery production exceeded statewide motor fuels demand by 14–20 percent. These emission caps would not curtail California's fuel supply or threaten existing refinery jobs, as the oil companies falsely assert.

Respectfully,

Greg Karras

Senior Scientist

Attachments: three tables

Table KR-A. California total gasoline and distillate/diesel production and demand data.

- (a) California Bureau of Equilization; www.boe.ca.gov/sptaxprog/spftrpts.htm
- (b) California Energy Commission; http://energy.ca.gov/almanac/petroleum_data/fuels_watch

b: barrel; 42 gallons

	,	Gasoline taxable sales ^a		Diesel taxable sales ^a		Refinery gasolii	ne production ^b	Refinery distilla	ate production ^b	Excess production (gasol+dist.)		
Year	Month	(gallons)	(12-Mo av b/d)	(gallons)	(12-Mo av b/d)	(b/day)	(12-Mo av b/d)	(b/day)	(12-Mo av b/d)	(12-Mo av b/d)	(% production)	
2006	January	1,290,262,436				1,025,151		316,321			, ,	
2006	February	1,228,819,660				1,117,101		340,821				
2006	March	1,354,413,053				1,055,883		330,914				
2006	April	1,299,137,141				1,094,070		324,857				
2006	•	1,339,339,771				1,144,603		347,371				
2006	•	1,335,036,208				1,139,128		372,036				
2006		1,345,503,878				1,089,054		350,357				
	August	1,374,634,731				1,133,241		366,171				
	September	1,308,141,099				1,094,604		370,571				
	October	1,346,922,715				1,142,698		345,286				
2006	November	1,283,977,484				1,122,634		332,286				
	December	1,335,810,146	1,033,398			1,186,832	1,112,083	381,750	348,228			
	January	1,298,885,664	1,033,961			1,037,978	1,113,152	289,486	345,992			
	February	1,202,818,767	1,032,265			997,708	1,103,203	268,643	339,977			
	March	1,357,822,002	1,032,487			968,824	1,095,948	294,286	336,925			
2007		1,289,138,453	1,031,835			1,066,933	1,093,686	317,357	336,300			
2007	•	1,350,460,982	1,032,560			1,140,210	1,093,320	362,886	337,593			
2007	•	1,313,842,612	1,031,178			1,123,111	1,091,986	302,929	331,834			
2007		1,332,676,853	1,030,341			1,148,270	1,096,920	332,543	330,350			
	August	1,375,580,934	1,030,403			1,152,672	1,098,540	400,429	333,204			
	September	1,283,184,069	1,028,775			1,126,629	1,101,208	386,357	334,520			
	October	1,320,295,242	1,027,038			1,045,529	1,093,111	361,543	335,875			
2007	November	1,249,323,308	1,024,777			1,072,289	1,088,915	375,929	339,512			
2007	December	1,295,302,543	1,022,135			1,119,896	1,083,337	353,536	337,160			
2008	January	1,234,472,901	1,017,933	234,700,260		1,024,826	1,082,241	345,571	341,834			
2008	February	1,282,275,797	1,023,116	223,985,934		1,039,262	1,085,704	346,250	348,301			
2008	March	1,309,507,897	1,019,965	241,439,734		987,489	1,087,260	353,607	353,245			
2008	April	1,257,478,243	1,017,900	230,152,121		1,007,557	1,082,312	351,321	356,075			
2008	May	1,283,632,210	1,013,540	225,272,249		1,066,519	1,076,171	351,857	355,156			
2008	June	1,214,526,818	1,007,062	260,434,744		1,049,505	1,070,037	392,536	362,623			
2008	July	1,257,415,374	1,002,152	243,095,395		1,052,506	1,062,057	403,821	368,563			
2008	August	1,259,535,970	994,583	234,022,307		1,051,391	1,053,617	399,571	368,492			
2008	September	1,218,721,221	990,378	254,394,579		1,080,509	1,049,773	395,607	369,262			
2008	October	1,251,514,350	985,891	252,471,983		1,030,140	1,048,491	398,543	372,346			
2008	November	1,197,991,322	982,542	204,150,018		1,074,022	1,048,635	387,393	373,301			
2008	December	1,265,157,860	980,576	223,406,881	184,444	995,943	1,038,306	344,714	372,566	245,852	17%	
2009	January	1,212,487,451	979,142	197,283,143	182,003	949,844	1,032,057	328,607	371,152	242,064	17%	
	February	1,121,912,239	968,681	181,765,826	179,249	991,041	1,028,039	337,750	370,444	250,553	18%	
	March	1,279,318,383	966,712	240,173,563	179,167	1,034,834	1,031,984	318,143	367,489	253,595	18%	
2009	April	1,247,536,585	966,063	219,920,756	178,499	1,067,541	1,036,983	339,607	366,512	258,933	18%	
2009	May	1,291,314,554	966,564	209,471,285	177,468	1,100,758	1,039,836	342,686	365,748	261,552	19%	
2009	June	1,233,792,786	967,821	223,555,180	175,063	1,118,108	1,045,553	346,214	361,888	264,557	19%	

 $\textbf{Table KR-A. California total gasoline and distillate/diesel production and demand data-} \\ continued$

- (a) California Bureau of Equilization; www.boe.ca.gov/sptaxprog/spftrpts.htm
- (b) California Energy Commission; http://energy.ca.gov/almanac/petroleum_data/fuels_watch

b: barrel; 42 gallons

	b: barrei; 42	-									
		Gasoline taxable	e sales ^a	Diesel taxable	sales ^a		ine production ^b	Refinery distill	ate production ^b	Excess production	on (gasol+dist.)
	Month	(5)	(12-Mo av b/d)	(5)	(12-Mo av b/d)	(, , , ,	(12-Mo av b/d)	(, , , ,	(12-Mo av b/d)	, ,	(% production)
	July	1,284,485,838	969,587	215,772,974	173,280	1,069,881	1,047,001	325,829	355,389	259,522	19%
2009	August	1,267,878,839	970,131	193,949,828	170,666	1,076,315	1,049,078	294,679	346,648	254,928	18%
2009	September	1,219,279,786	970,168	244,412,169	170,015	1,075,769	1,048,683	322,393	340,547	249,047	18%
2009	October	1,245,985,450	969,807	224,450,417	168,187	1,044,712	1,049,897	315,343	333,613	245,516	18%
2009	November	1,170,268,541	967,999	197,664,779	167,764	1,023,089	1,045,653	305,179	326,762	236,652	17%
2009	December	1,237,021,075	966,163	231,720,029	168,307	975,241	1,043,928	310,786	323,935	233,393	17%
	January	1,172,751,145	963,571	188,705,030	167,747	1,046,139	1,051,952	264,250	318,572	239,206	17%
2010	February	1,130,899,111	964,157	195,563,666	168,647	1,017,582	1,054,164	265,821	312,578	233,937	17%
2010	March	1,272,640,468	963,722	234,903,120	168,303	1,073,491	1,057,386	299,143	310,994	236,355	17%
2010	April	1,254,775,791	964,194	204,318,970	167,286	1,094,529	1,059,635	352,250	312,048	240,203	18%
2010	May	1,289,885,802	964,101	205,110,704	167,001	1,067,586	1,056,870	395,000	316,407	242,176	18%
2010	June	1,255,432,005	965,512	251,256,188	168,808	1,087,229	1,054,297	378,393	319,089	239,065	17%
2010	July	1,273,677,743	964,807	219,318,120	169,039	1,091,723	1,056,117	347,257	320,875	243,145	18%
2010	August	1,291,164,966	966,326	205,138,797	169,769	1,117,397	1,059,541	320,086	322,992	246,437	18%
2010	September	1,237,725,377	967,530	244,810,944	169,795	1,084,861	1,060,298	355,000	325,709	248,683	18%
2010	October	1,256,958,886	968,245	215,881,238	169,236	974,050	1,054,410	359,571	329,395	246,323	18%
2010	November	1,200,852,654	970,240	207,283,073	169,864	1,004,009	1,052,820	342,371	332,494	245,210	18%
2010	December	1,232,128,839	969,921	218,365,238	168,993	1,085,586	1,062,015	357,964	336,426	259,527	19%
2011	January	1,204,096,468	971,966	191,265,324	169,160	1,048,650	1,062,224	327,643	341,708	262,807	19%
	February	1,131,200,286	971,986	176,452,952	167,913	983,293	1,059,367	292,429	343,926	263,394	19%
2011	March	1,237,807,877	969,713	218,708,007	166,856	1,007,726	1,053,887	343,771	347,645	264,961	19%
2011	April	1,204,833,929	966,456	210,355,533	167,250	1,056,725	1,050,736	335,857	346,279	263,309	19%
2011	May	1,237,497,276	963,038	213,094,669	167,771	1,056,054	1,049,775	323,914	340,355	259,321	19%
2011	June	1,220,789,762	960,778	243,344,006	167,255	1,075,368	1,048,787	344,107	337,498	258,251	19%
2011	July	1,245,916,412	958,968	223,447,912	167,524	1,073,618	1,047,278	407,464	342,515	263,301	19%
2011	August	1,269,658,460	957,565	227,911,450	169,010	1,100,109	1,045,837	360,600	345,891	265,154	19%
2011	September	1,211,495,250	955,854	261,926,745	170,126	1,081,393	1,045,548	351,143	345,570	265,138	19%
2011	October	1,233,852,207	954,346	226,187,671	170,799	1,035,411	1,050,662	340,250	343,959	269,476	19%
2011	November	1,169,249,871	952,285	196,225,303	170,077	1,018,100	1,051,836	353,171	344,859	274,333	20%
2011	December	1,233,735,965	952,390	233,614,553	171,072	964,775	1,041,769	351,036	344,282	262,589	19%
2012	January	1,165,769,473	949,890	181,003,409	170,403	975,903	1,035,706	318,343	343,507	258,921	19%
2012	February	1,154,582,904	951,415	184,093,977	170,901	982,439	1,035,635	278,036	342,308	255,627	19%
2012	March	1,237,090,205	951,368	231,409,056	171,730	1,051,143	1,039,253	349,214	342,761	258,917	19%
2012	April	1,183,756,696	949,993	197,559,932	170,895	1,051,111	1,038,785	315,286	341,047	258,944	19%
2012	May	1,277,903,245	952,629	228,146,495	171,877	1,120,906	1,044,190	323,486	341,011	260,695	19%
2012	June	1,230,283,199	953,248	250,024,610	172,313	1,115,625	1,047,544	367,536	342,964	264,948	19%
2012	July	1,230,261,987	952,227	217,801,078	171,944	1,048,740	1,045,471	387,714	341,318	262,618	19%
2012	August	1,255,713,656	951,317	223,131,870	171,632	1,049,850	1,041,283	328,929	338,679	257,012	19%
		1,194,012,527	950,177	237,216,063	170,020	1,039,207	1,037,768	370,321	340,277	257,847	19%
	October	1,220,857,664	949,329	234,650,829	170,573	1,052,294	1,039,174	345,543	340,718	259,991	19%
2012	November	1,162,560,411	948,893	191,711,268	170,278	1,009,146	1,038,428	332,536	338,998	258,256	19%
2012	December	1,192,002,207	946,171	226,797,044	169,833	1,037,604	1,044,497	341,071	338,168	266,661	19%

 $\textbf{Table KR-A. California total gasoline and distillate/diesel production and demand data-} \\ continued$

- (a) California Bureau of Equilization; www.boe.ca.gov/sptaxprog/spftrpts.htm
- (b) California Energy Commission; http://energy.ca.gov/almanac/petroleum_data/fuels_watch
- b: barrel; 42 gallons

	b: barrel; 42 gallons											
		Gasoline taxable	e sales ^a	Diesel taxable	sales ^a	Refinery gasol	ine production ^b	Refinery distill	ate production ^b	Excess production	on (gasol+dist.)	
	Month	(gallons)	(12-Mo av b/d)	(gallons)	(12-Mo av b/d)	(b/day)	(12-Mo av b/d)	(b/day)	(12-Mo av b/d)	(12-Mo av b/d)	(% production)	
2013	January	1,169,694,474	946,427	196,055,634	170,815	925,926	1,040,333	293,229	336,075	259,166	19%	
2013	February	1,097,679,113	942,715	184,893,748	170,867	878,436	1,031,666	314,714	339,132	257,215	19%	
2013	March	1,237,136,829	942,718	240,932,088	171,489	919,836	1,020,723	338,893	338,272	244,789	18%	
2013	April	1,207,530,235	944,268	208,511,279	172,203	983,546	1,015,093	337,571	340,129	238,750	18%	
2013	May	1,259,306,999	943,055	232,587,197	172,493	1,078,368	1,011,548	382,571	345,052	241,052	18%	
2013	June	1,216,894,566	942,182	254,803,659	172,804	1,096,057	1,009,918	360,500	344,466	239,397	18%	
2013	July	1,241,703,883	942,928	220,516,843	172,982	1,103,940	1,014,518	361,229	342,259	240,866	18%	
2013	August	1,275,028,439	944,188	239,921,789	174,077	1,043,543	1,013,992	383,071	346,771	242,498	18%	
2013	September	1,196,126,013	944,326	255,249,242	175,253	986,768	1,009,622	376,536	347,289	237,331	17%	
2013	October	1,242,839,671	945,760	238,359,920	175,495	1,018,563	1,006,811	388,543	350,872	236,428	17%	
2013	November	1,172,066,456	946,380	209,293,623	176,642	1,024,361	1,008,079	353,571	352,625	237,682	17%	
2013	December	1,216,937,753	948,007	259,180,630	178,754	1,032,503	1,007,654	419,057	359,124	240,016	18%	
2014	January	1,174,580,507	948,326	201,991,138	179,142	1,041,050	1,017,248	369,393	365,471	255,251	18%	
2014	February	1,107,924,666	948,994	187,594,207	179,318	938,600	1,022,261	353,929	368,739	262,688	19%	
2014	March	1,246,115,090	949,580	231,193,811	178,683	967,239	1,026,212	398,464	373,703	271,652	19%	
2014	April	1,210,319,338	949,761	214,171,368	179,052	1,003,046	1,027,837	385,400	377,689	276,712	20%	
2014	May	1,272,686,261	950,634	231,099,276	178,955	1,031,671	1,023,945	372,179	376,823	271,179	19%	
2014	June	1,217,309,896	950,661	253,209,845	178,851	1,058,229	1,020,793	341,786	375,263	266,544	19%	
2014	July	1,250,901,273	951,261	242,734,702	180,300	1,035,343	1,015,076	369,686	375,968	259,483	19%	
2014	August	1,285,170,048	951,923	239,718,243	180,287	1,094,239	1,019,301	367,464	374,667	261,759	19%	
2014	September	1,222,879,913	953,668	264,722,388	180,905	1,085,566	1,027,534	364,714	373,682	266,644	19%	
2014	October	1,271,773,798	955,555	246,623,042	181,444	1,052,650	1,030,375	352,321	370,664	264,039	19%	
2014	November	1,194,414,902	957,013	209,521,386	181,459	1,104,414	1,037,046	411,036	375,452	274,026	19%	
2014	December	1,248,556,730	959,076	253,600,951	181,095	1,123,103	1,044,596	390,800	373,098	277,523	20%	
2015	January	1,216,497,576	961,810	197,537,337	180,804	948,468	1,036,881	365,036	372,735	267,001	19%	
2015	February	1,148,447,060	964,453	193,779,164	181,208	990,436	1,041,200	310,036	369,077	264,616	19%	
2015	March	1,287,581,812	967,158	263,113,370	183,290	999,251	1,043,868	342,286	364,395	257,815	18%	
2015	April	1,254,633,595	970,049	220,397,637	183,696	1,069,311	1,049,390	368,071	362,951	258,596	18%	
2015	May	1,278,463,759	970,426	220,949,857	183,034	1,015,957	1,048,081	342,643	360,490	255,111	18%	
2015	June	1,262,121,393	973,349	257,066,137	183,285	1,031,389	1,045,844	349,343	361,120	250,329	18%	
2015	July	1,279,082,202	975,187	240,176,558	183,118	1,076,132	1,049,243	343,714	358,955	249,892	18%	
2015	August	1,315,596,270	977,172	246,344,768	183,551	998,904	1,041,298	347,179	357,265	237,840	17%	
2015	September	1,264,298,745	979,874	270,451,396	183,924	1,099,946	1,042,497	380,914	358,615	237,313	17%	
2015	October	1,303,962,044	981,974	246,699,175	183,929	942,625	1,033,328	325,000	356,338	223,763	16%	
2015	November	1,224,602,888	983,943	218,883,579	184,540	992,882	1,024,034	350,357	351,282	206,832	15%	
2015	December	1,270,061,496	985,346	249,260,828	184,257	1,003,150	1,014,038	355,929	348,376	192,811	14%	
2016	January	1,221,372,599	985,664	217,753,398	185,576	993,595	1,017,798	294,905	342,531	189,090	14%	
2016	February	1,224,425,194	990,620	212,731,245	186,812	1,015,754	1,019,908	345,429	345,481	187,957	14%	
2016	March	1,300,298,942	991,449	267,381,356	187,090	1,000,820	1,020,039	357,543	346,752	188,251	14%	
2016	April	1,274,448,751	992,742	248,059,116	188,895	1,097,261	1,022,368	354,000	345,580	186,311	14%	
2016	May	1,323,331,105	995,669	216,937,963	188,633	1,124,309	1,031,397	350,486	346,233	193,329	14%	
2016	June	1,295,550,673	997,849	273,005,811	189,673	1,101,693	1,037,256	357,250	346,892	196,626	14%	

Table KR-A. California total gasoline and distillate/diesel production and demand data—continued

- (a) California Bureau of Equilization; www.boe.ca.gov/sptaxprog/spftrpts.htm
- (b) California Energy Commission; http://energy.ca.gov/almanac/petroleum_data/fuels_watch
- b: barrel; 42 gallons

		Gasoline taxabl	e sales ^a	Diesel taxable sales ^a		Refinery gasoline production ^D		Refinery distill	ate production ^D	Excess production (gasol+dist.)	
Year	Month	(gallons)	(12-Mo av b/d)	(gallons)	(12-Mo av b/d)	(b/day)	(12-Mo av b/d)	(b/day)	(12-Mo av b/d)	(12-Mo av b/d)	(% production)
2016	July	1,331,548,556	1,001,272	251,724,789	190,426	1,119,525	1,040,872	376,000	349,583	198,757	14%
2016	August	1,363,294,300	1,004,383	269,281,410	191,922	1,165,814	1,054,781	409,657	354,789	213,265	15%
2016	September	1,288,772,790	1,005,980	292,758,016	193,377	1,056,229	1,051,138	377,107	354,472	206,253	15%
2016	October	1,318,576,424	1,006,933	254,148,157	193,863	1,073,846	1,062,073	275,607	350,356	211,633	15%
2016	November	1,251,416,220	1,008,682	234,619,758	194,890	1,076,809	1,069,067	357,000	350,909	216,404	15%
2016	December	1,294,921,318	1,010,304	266,869,607	196,039	1,088,293	1,076,162	347,714	350,225	220,045	15%
2017	January	1,228,865,654	1,010,793	211,288,592	195,617	1,077,821	1,083,181	353,821	355,135	231,906	16%
2017	February	1,161,081,695	1,006,661	208,211,775	195,322	1,047,214	1,085,803	312,250	352,370	236,190	16%

Table KR-B. West Coast (PADD 5) finished gasoline, distillate, and petroleum coke demand, import, and export data.

b: barrel; 42 gallons

Source US Energy Information Administration; http://www.eia.gov/dnav/pet/pet_sum_snd_d_r50_mbblpd_m_cur.htm

		Product supp	lied (gasoline)	Product supp	olied (distillate)	Gasoline impor	ts / exports	Distillate impor	ts / exports	Pet coke import	s / exports	Net expor	ts (12-Mo a	av, in b/d)
Year	Month	(b/d) (1	12-Mo av b/d)	(b/d) (12-M0 av b/d)	Imports (b/d)	Exports (b/d)	Imports (b/d)	Exports (b/d)	Imports (b/d) [xports (b/d)	Gasoline	Distillate	Pet coke
2006	January	1,547,000		522,000		9,000	9,000	3,000	36,000	1,000	114,000			
2006	February	1,599,000		520,000		9,000	14,000	14,000	27,000	1,000	172,000			
2006	March	1,631,000		572,000		21,000	5,000	37,000	20,000	1,000	75,000			
2006	April	1,617,000		538,000		28,000	5,000	59,000	46,000	0	110,000			
2006	May	1,614,000		596,000		53,000	18,000	28,000	26,000	1,000	93,000			
2006	June	1,703,000		575,000		29,000	13,000	36,000	29,000	0	140,000			
2006	July	1,714,000		620,000		14,000	8,000	53,000	25,000	0	74,000			
2006	August	1,662,000		615,000		56,000	0	24,000	31,000	1,000	94,000			
2006	September	1,655,000		610,000		13,000	0	69,000	36,000	1,000	85,000			
2006	October	1,615,000		592,000		19,000	2,000	14,000	24,000	0	100,000			
2006	November	1,634,000		586,000		5,000	4,000	19,000	17,000	1,000	92,000			
2006	December	1,610,000	1,633,417	519,000	572,083	0	0	34,000	5,000	1,000	81,000	-14,833	-5,667	101,833
2007	January	1,602,000	1,638,000	557,000	575,000	22,000	0	21,000	3,000	1,000	99,000	-16,667	-9,917	100,583
2007	February	1,573,000	1,635,833	522,000	575,167	56,000	3,000	54,000	25,000	1,000	71,000	-21,500	-13,417	92,167
2007	March	1,590,000	1,632,417	556,000	573,833	48,000	0	68,000	14,000	1,000	59,000	-24,167	-16,500	90,833
2007	April	1,674,000	1,637,167	599,000	578,917	33,000	3,000	58,000	15,000	1,000	96,000	-24,750	-19,000	89,583
2007	May	1,684,000	1,643,000	590,000	578,417	79,000	3,000	22,000	33,000	1,000	114,000	-28,167	-17,917	91,333
2007	June	1,642,000	1,637,917	589,000	579,583	42,000	7,000	30,000	44,000	1,000	81,000	-29,750	-16,167	86,333
2007	July	1,662,000	1,633,583	593,000	577,333	20,000	5,000	60,000	29,000	0	99,000	-30,500	-16,417	88,417
2007	August	1,726,000	1,638,917	617,000	577,500	46,000	4,000	42,000	37,000	1,000	75,000	-29,333	-17,417	86,833
2007	September		1,636,583	566,000	573,833	26,000	12,000	10,000	45,000	1,000	50,000	-29,417	-11,750	83,917
2007	October	1,563,000	1,632,250	594,000	574,000	3,000	10,000	22,000	23,000	1,000	72,000	-27,417	-12,500	81,500
2007	November	1,606,000	1,629,917	506,000	567,333	23,000	0	1,000	47,000	1,000	98,000	-29,250	-8,500	82,000
2007		1,559,000	1,625,667	483,000	564,333	9,000	0	9,000	75,000	1,000	51,000	-30,000	-583	79,500
2008	January	1,478,000	1,615,333	509,000	560,333	14,000	13,000	15,000	53,000	1,000	78,000	-28,250	4,083	77,750
2008	February	1,571,000	1,615,167	505,000	558,917	23,000	49,000	1,000	111,000	1,000	62,000	-21,667	15,667	77,000
2008	March	1,612,000	1,617,000	505,000	554,667	21,000	12,000	2,000	94,000	1,000	87,000	-18,417	27,833	79,333
2008	April	1,570,000	1,608,333	505,000	546,833	20,000	32,000	12,000	88,000	0	81,000	-14,917	37,750	78,167
2008	May	1,582,000	1,599,833	550,000	543,500	27,000	34,000	14,000	43,000	1,000	79,000	-8,000	39,250	75,250
2008	June	1,623,000	1,598,250	540,000	539,417	19,000	9,000	1,000	95,000	1,000	107,000	-5,917	45,917	77,417
2008	July	1,641,000	1,596,500	536,000	534,667	23,000	18,000	23,000	92,000	1,000	85,000	-5,083	54,250	76,167
2008	August	1,647,000	1,589,917	530,000	527,417	30,000	26,000	1,000	116,000	1,000	99,000	-1,917	64,250	78,167
2008	September	1,565,000	1,584,750	589,000	529,333	5,000	35,000	17,000	87,000	1,000	97,000	1,750	67,167	82,083
2008	October	1,544,000	1,583,167	605,000	530,250	3,000	39,000	1,000	57,000	1,000	86,000	4,167	71,750	83,250
2008	November	1,549,000	1,578,417	473,000	527,500	3,000	27,000	12,000	68,000	1,000	116,000	8,083	72,583	84,750
2008	December	1,515,000	1,574,750	443,000	524,167	0	40,000	4,000	152,000	1,000	98,000	12,167	79,417	88,667
2009	January	1,401,000	1,568,333	420,000	516,750	23,000	18,000	11,000	140,000	1,000	123,000	11,833	87,000	92,417
2009	February	1,420,000	1,555,750	456,000	512,667	23,000	33,000	8,000	92,000	2,000	153,000	10,500	84,833	99,917
2009	March	1,544,000	1,550,083	465,000	509,333	34,000	17,000	1,000	103,000	1,000	131,000	9,833	85,667	103,583
2009	April	1,580,000	1,550,917	478,000	507,083	23,000	30,000	13,000	93,000	0	111,000	9,417	86,000	106,083
2009	May	1,558,000	1,548,917	481,000	501,333	17,000	30,000	24,000	59,000	1,000	79,000	9,917	86,500	106,083
2009	June	1,610,000	1,547,833	516,000	499,333	13,000	6,000	19,000	45,000	1,000	98,000	10,167	80,833	105,333
2009	July	1,599,000	1,544,333	527,000	498,583	15,000	30,000	13,000	21,000	1,000	147,000	11,833	75,750	110,500
2009	August	1,559,000	1,537,000	487,000	495,000	18,000	27,000	8,000	64,000	1,000	116,000	12,917	70,833	111,917

Table KR-B. West Coast (PADD 5) finished gasoline, distillate, and petroleum coke demand, import, and export data—continued

b: barrel; 42 gallons

Source US Energy Information Administration; http://www.eia.gov/dnav/pet/pet_sum_snd_d_r50_mbblpd_m_cur.htm

		Product sup	plied (gasoline)	Product sup	oplied (distillate)	Gasoline impo	rts / exports	Distillate impor	rts / exports	Pet coke imports	/ exports	Net export	s (12-Mo a	av, in b/d)
Year	Month	(b/d)	(12-Mo av b/d)	(b/d)	(12-M0 av b/d)	Imports (b/d)	Exports (b/d)	Imports (b/d)	Exports (b/d)	Imports (b/d) Ex		Gasoline		Pet coke
2009	September		1,534,750	503,000	487,833	21,000	43,000	33,000	29,000	1,000	100,000	12,250	64,667	112,167
2009	October	1,521,000	1,532,833	452,000	475,083	14,000	21,000	21,000	60,000	1,000	92,000	9,833	63,250	112,667
2009	November		1,528,750	482,000	475,833	3,000	43,000	6,000	52,000	1,000	107,000	11,167	62,417	111,917
2009	December	1,503,000	1,527,750	447,000	476,167	14,000	47,000	5,000	49,000	1,000	100,000	10,583	53,750	112,083
2010	January	1,467,000	1,533,250	429,000	476,917	9,000	37,000	14,000	67,000	1,000	144,000	13,333	47,417	113,833
2010	February	1,462,000	1,536,750	447,000	476,167	17,000	62,000	7,000	75,000	1,000	77,000	16,250	46,083	107,583
2010	March	1,568,000	1,538,750	495,000	478,667	11,000	80,000	6,000	29,000	1,000	94,000	23,417	39,500	104,500
2010	April	1,559,000	1,537,000	484,000	479,167	21,000	37,000	11,000	52,000	1,000	106,000	24,167	36,250	104,000
2010	May	1,569,000	1,537,917	515,000	482,000	17,000	42,000	6,000	37,000	1,000	136,000	25,167	35,917	108,750
2010	June	1,564,000	1,534,083	494,000	480,167	11,000	35,000	3,000	48,000	1,000	103,000	27,750	37,500	109,167
2010	July	1,562,000	1,531,000	519,000	479,500	8,000	24,000	12,000	21,000	1,000	102,000	27,833	37,583	105,417
2010	August	1,542,000	1,529,583	537,000	483,667	29,000	9,000	23,000	28,000	1,000	124,000	25,417	33,333	106,083
2010	September		1,533,833	511,000	484,333	23,000	27,000	17,000	47,000	0	109,000	23,917	36,167	106,917
2010	October	1,522,000	1,533,917	508,000	489,000	3,000	41,000	3,000	53,000	1,000	103,000	26,500	37,083	107,833
2010	November		1,532,833	488,000	489,500	14,000	30,000	3,000	37,000	1,000	127,000	24,500	36,083	109,500
2010		1,462,000	1,529,417	460,000	490,583	1,000	59,000	7,000	61,000	1,000	113,000	26,583	36,917	110,583
2011	January	1,452,000	1,528,167	463,000	493,417	1,000	28,000	2,000	72,000	1,000	123,000	26,500	38,333	108,833
2011	February	1,497,000	1,531,083	485,000	496,583	2,000	57,000	7,000	83,000	1,000	110,000	27,333	39,000	111,583
2011	March	1,464,000	1,522,417	490,000	496,167	8,000	40,000	4,000	86,000	1,000	129,000	24,250	43,917	114,500
2011	April	1,500,000	1,517,500	528,000	499,833	1,000	27,000	30,000	62,000	1,000	110,000	25,083	43,167	114,833
2011	May	1,519,000	1,513,333	488,000	497,583	0	33,000	0	43,000	1,000	105,000	25,750	44,167	112,250
2011	June	1,524,000	1,510,000	533,000	500,833	1,000	53,000	9,000	65,000	1,000	107,000	28,083	45,083	112,583
2011	July	1,547,000	1,508,750	512,000	500,250	2,000	42,000	6,000	80,000	0	142,000	30,083	50,500	116,000
2011	August	1,605,000	1,514,000	534,000	500,000	2,000	87,000	7,000	148,000	1,000	125,000	38,833	61,833	116,083
2011	September		1,509,833	533,000	501,833	1,000	40,000	7,000	48,000	1,000	119,000	41,750	62,750	116,833
2011	October	1,514,000	1,509,167	511,000	502,083	1,000	32,000	3,000	64,000	1,000	123,000	41,167	63,667	118,500
2011	November		1,507,083	513,000	504,167	13,000	42,000	3,000	64,000	1,000	115,000	42,250	65,917	117,500
2011		1,500,000	1,510,250	483,000	506,083	2,000	33,000	10,000	86,000	1,000	128,000	40,000	67,750	118,750
2012	January	1,455,000	1,510,500	467,000	506,417	1,000	19,000	4,000	105,000	1,000	104,000	39,250	70,333	117,167
2012	February	1,426,000	1,504,583	455,000	503,917	4,000	45,000	2,000	69,000	1,000	123,000	38,083	69,583	118,250
2012		1,459,000	1,504,167	456,000	501,083	0	27,000	16,000	60,000	2,000	125,000	37,667	66,417	117,833
2012	April	1,520,000	1,505,833	489,000	497,833	4,000	30,000	5,000	52,000	1,000	127,000	37,667	67,667	119,250
2012	May	1,509,000	1,505,000	488,000	497,833	1,000	25,000	9,000	72,000	2,000	117,000	36,917	69,333	120,167
2012		1,564,000	1,508,333	525,000	497,167	2,000	20,000	13,000	64,000	1,000	116,000	34,083	68,917	120,917
2012	July	1,527,000	1,506,667	516,000	497,500	1,000	36,000	28,000	113,000	1,000	151,000	33,667	69,833	121,583
2012	August	1,553,000	1,502,333	548,000	498,667	13,000	38,000	9,000	82,000	1,000	125,000	28,667	64,167	121,583
2012	September		1,499,000	502,000	496,083	2,000	38,000	6,000	43,000	1,000	113,000	28,417	63,833	121,083
2012	October	1,478,000	1,496,000	499,000	495,083	4,000	34,000	6,000	100,000	0	143,000	28,333	66,583	122,833
2012	November		1,496,417	499,000	493,917	5,000	41,000	13,000	80,000	1,000	113,000	28,917	67,083	122,667
2012		1,449,000	1,492,167	388,000	486,000	3,000	68,000	0	116,000	1,000	140,000	31,750	70,417	123,667
2013	January	1,365,000	1,484,667	461,000	485,500	1,000	41,000	0	121,000	1,000	153,000	33,583	72,083	127,750
2013	February	1,464,000	1,487,833	480,000	487,583	4,000	43,000	0	101,000	1,000	121,000	33,417	74,917	127,583
2013	March	1,501,000	1,491,333	459,000	487,833	3,000	19,000	0	84,000	1,000	117,000	32,500	78,250	127,000
2013	April	1,505,000	1,490,083	485,000	487,500	1,000	31,000	0	92,000	1,000	148,000	32,833	82,000	128,750

Table KR-B. West Coast (PADD 5) finished gasoline, distillate, and petroleum coke demand, import, and export data—continued

b: barrel; 42 gallons

Source US Energy Information Administration; http://www.eia.gov/dnav/pet/pet_sum_snd_d_r50_mbblpd_m_cur.htm

		Product supp	olied (gasoline)	Product su	pplied (distillate)	Gasoline impo	rts / exports	Distillate impor	rts / exports	Pet coke imports	/ exports	Net export	s (12-Mo a	av, in b/d)
Year	Month	(b/d) ((12-Mo av b/d)	(b/d)	(12-M0 av b/d)	Imports (b/d)	Exports (b/d)	Imports (b/d)	Exports (b/d)	Imports (b/d) Ex	(ports (b/d)	Gasoline	Distillate	Pet coke
2013	May	1,567,000	1,494,917	498,000	488,333	13,000	19,000	11,000	101,000	1,000	124,000	31,333	84,250	129,417
2013	June	1,520,000	1,491,250	484,000	484,917	17,000	46,000	20,000	136,000	1,000	110,000	32,250	89,667	128,917
2013	July	1,585,000	1,496,083	498,000	483,417	31,000	61,000	14,000	167,000	1,000	153,000	31,833	95,333	129,083
2013	August	1,569,000	1,497,417	537,000	482,500	13,000	17,000	27,000	131,000	1,000	107,000	30,083	97,917	127,583
2013	September	1,518,000	1,499,000	495,000	481,917	3,000	38,000	10,000	111,000	1,000	107,000	30,000	103,250	127,083
2013	October	1,497,000	1,500,583	503,000	482,250	1,000	34,000	10,000	137,000	0	104,000	30,250	106,000	123,833
2013	November		1,501,583	484,000	481,000	6,000	52,000	7,000	150,000	1,000	121,000	31,083	112,333	124,500
2013		1,508,000	1,506,500	425,000	484,083	2,000	71,000	5,000	174,000	1,000	137,000	31,417	116,750	124,250
2014	January	1,440,000	1,512,750	479,000	485,583	2,000	78,000	5,000	125,000	1,000	116,000	34,417	116,667	121,167
2014	February	1,514,000	1,516,917	491,000	486,500	2,000	39,000	7,000	113,000	1,000	125,000	34,250	117,083	121,500
2014	March	1,510,000	1,517,667	473,000	487,667	1,000	38,000	4,000	183,000	1,000	117,000	36,000	125,000	121,500
2014	April	1,545,000	1,521,000	537,000	492,000	1,000	34,000	7,000	146,000	1,000	124,000	36,250	128,917	119,500
2014	May	1,566,000	1,520,917	511,000	493,083	1,000	60,000	6,000	80,000	0	127,000	40,667	127,583	119,833
2014	June	1,588,000	1,526,583	536,000	497,417	3,000	28,000	12,000	113,000	2,000	111,000	40,333	126,333	119,833
2014	July	1,538,000	1,522,667	541,000	501,000	4,000	41,000	25,000	96,000	1,000	114,000	40,917	119,500	116,583
2014	August	1,573,000	1,523,000	561,000	503,000	2,000	34,000	15,000	42,000	1,000	139,000	43,250	113,083	119,250
2014		, ,	1,525,333	527,000	505,667	2,000	40,000	12,000	57,000	1,000	124,000	43,500	108,417	120,667
2014	October	1,556,000	1,530,250	555,000	510,000	1,000	35,000	17,000	89,000	1,000	115,000	43,583	103,833	121,500
2014	November		1,534,000	443,000	506,583	1,000	62,000	4,000	153,000	1,000	103,000	44,833	104,333	120,000
2014		1,515,000	1,534,583	518,000	514,333	4,000	88,000	5,000	135,000	1,000	139,000	46,083	101,083	120,167
2015	January	1,440,000	1,534,583	480,000	514,417	2,000	55,000	4,000	147,000	1,000	108,000	44,167	103,000	119,500
2015	February	1,548,000	1,537,417	535,000	518,083	0	48,000	58,000	107,000	1,000	123,000	45,083	98,250	119,333
2015	March	1,601,000	1,545,000	502,000	520,500	7,000	37,000	3,000	78,000	1,000	125,000	44,500	89,583	120,000
2015	April	1,601,000	1,549,667	513,000	518,500	1,000	32,000	8,000	139,000	1,000	103,000	44,333	88,917	118,250
2015	May	1,592,000	1,551,833	512,000	518,583	29,000	24,000	22,000	109,000	1,000	124,000	39,000	90,000	117,917
2015	June	1,621,000	1,554,583	537,000	518,667	17,000	30,000	20,000	74,000	1,000	106,000	38,000	86,083	117,583
2015	July	1,624,000	1,561,750	573,000	521,333	6,000	39,000	23,000	93,000	1,000	124,000	37,667	86,000	118,417
2015	August	1,608,000	1,564,667	560,000	521,250	8,000	17,000	15,000	83,000	1,000	112,000	35,750	89,417	116,167
2015	September		1,568,250	561,000	524,083	2,000	22,000	14,000	127,000	1,000	139,000	34,250	95,083	117,417
2015	October	1,604,000	1,572,250	564,000	524,833	1,000	16,000	6,000	84,000	1,000	91,000	32,667	95,583	115,417
2015	November		1,574,917	476,000	527,583	1,000	30,000	4,000	123,000	1,000	118,000	30,000	93,083	116,667
2015		1,569,000	1,579,417	500,000	526,083	3,000	44,000	4,000	106,000	0	132,000	26,417	90,750	116,167
2016	January	1,506,000	1,584,917	447,000	523,333	2,000	20,000	7,000	107,000	1,000	115,000	23,500	87,167	116,750
2016	February	1,606,000	1,589,750	511,000	521,333	1,000	53,000	13,000	96,000	1,000	117,000	23,833	90,000	116,250
2016	March	1,581,000	1,588,083	506,000	521,667	5,000	85,000	7,000	162,000	1,000	107,000	28,000	96,667	114,750
2016	April	1,591,000	1,587,250	506,000	521,083	1,000	39,000	4,000	131,000	0	116,000	28,583	96,333	115,917
2016	May	1,650,000	1,592,083	526,000	522,250	2,000	48,000	11,000	72,000	1,000	133,000	32,833	94,167	116,667
2016	June	1,655,000	1,594,917	556,000	523,833	5,000	76,000	33,000	82,000	2,000	121,000	37,667	93,750	117,833
2016	July	1,645,000	1,596,667	558,000	522,583	3,000	26,000	23,000	52,000	1,000	122,000	36,833	90,333	117,667
2016	August	1,694,000	1,603,833	601,000	526,000	2,000	62,000	37,000	66,000	1,000	147,000	41,083	87,083	120,583
2016	September		1,607,667	538,000	524,083	6,000	37,000	18,000	91,000	1,000	130,000	42,000	83,750	119,833
2016	October	1,574,000	1,605,167	542,000	522,250	5,000	42,000	2,000	80,000	1,000	100,000	43,833	83,750	120,583
2016	November		1,607,750	464,000	521,250	1,000	33,000	6,000	79,000	1,000	83,000	44,083	79,917	117,667
2016	December	1,602,000	1,610,500	471,000	518,833	1,000	91,000	4,000	121,000	1,000	112,000	48,167	81,167	115,917
2017	January	1,509,000	1,610,750	409,000	515,667	5,000	88,000	5,000	127,000	1,000	126,000	53,583	83,000	116,833
2017	February	1,534,000	1,604,750	449,000	510,500	7,000	54,000	17,000	123,000	1,000	145,000	53,167	84,917	119,167
2017	March	1,695,000	1,614,250	458,000	506,500	1,000	35,000	2,000	139,000	1,000	142,000	49,333	83,417	122,083

Table KR-C. Estimate calculation for cumulative GHG emissions associated with excess refinery production for export: emissions associated with West Coast exports of gasoline, distillate/diesel, and petroleum coke.

	Net Export	s (millions	of barrels) ^a	Emission f	actors (in k	g/barrel)	CO ₂ e emissions
	Gasoline	Distillate	Pet coke	Gasoline ^b	Distillate ^b	Pet coke ^c	(millions of tonnes)
Sep 2008-Aug 2009	4.71	25.9	40.8	492	565	685	44.9
Sep 2009-Aug 2010	9.28	12.2	38.7	492	565	685	37.9
Sep 2010-Aug 2011	14.17	22.6	42.4	492	565	685	48.7
Sep 2011-Aug 2012	10.46	23.4	44.4	492	565	685	48.8
Sep 2012-Aug 2013	10.98	35.7	46.6	492	565	685	57.5
Sep 2013-Aug 2014	15.79	41.3	43.5	492	565	685	60.9
Sep 2014-Aug 2015	13.05	32.6	42.4	492	565	685	53.9
Sep 2015-Aug 2016	15.00	31.8	44.0	492	565	685	55.5
Sep 2016-Mar 2017	10.77	21.5	25.3	492	565	685	34.7

Cumulative total export-related emissions from September 2008–March 2017: 443

Annualized average emission increase (percent): 3.59%

Notes

- (a) Data from US Energy Information Administration: $www.eia.gov/dnav/pet/pet_sum_snd_d_r50_mbblpd_m_cur.htm$
- (b) Emission factors from California Air Resources Board, Low Carbon Fuel Standard, default emissions; factors include emissions from oil extraction, oil transport, refining, and end use of gasoline and diesel. <u>See</u> 2015 LCFS reg. revision schedule (97.96 and 99.97 g/MJ gasoline and diesel, respectively) and Table 3 (5020.26 and 5647.74 MJ/b for gasoline and diesel, respectively).
- (c) Emission factor for combustion of petroleum coke from Karras, 2010 (Attachment KR-2: <u>See</u> Table S1). Figures may not sum due to rounding.