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Comments regarding Vaquero project for LCFS credits

“This is a perverse project in which a petroleum extraction company, Vaquero, is proposing to get LCFS credits by using photovoltaic electricity to run its petroleum pumping equipment. Thus, each kw of solar power produced is used to release a fraction of a barrel of petroleum from underground burial and introduce it into the biosphere. When that petroleum is refined and burned it introduces toxic air pollutants, criteria pollutants, and short- and long-term global warming gasses such as nitrous oxide, black carbon, methane, and carbon dioxide. CARB needs to consider all the emissions associated with this project including Scope 3, which would include the effects just cited. As a result, there would likely be no carbon credits.

Tiny incremental improvements in petroleum carbon intensity will never get us to carbon neutrality. Indeed, such provisions may delay our progress to move away from petroleum by propping up an industry that is not only a major carbon emitter, but also a resolute opponent of carbon emissions reduction since the earliest days of the LCFS.

I also note that there is at least one statute (in the Public Resources Code) that expressly states it is California’s policy to move away from petroleum. Likewise countless statutorily created programs at CEC and CARB seek to decarbonize our grid, our economy, and our transportation system on an aggressive schedule. In addition, this project is at cross purposes with Governor Newsom’s recent executive order, N-79-20, calling for an end to combustion in California by 2035 including the phase out of all light duty internal combustion vehicles. Any incentive at cross purposes with those over-arching, vital, goals is simply a bad idea.

Moreover, incentivizing investment in petroleum production and refining diverts investment from the innovation that offers the only hope of truly meeting our climate goals.”