



Don Gilstrap

Manager, Fuels Regulations

Monday, June 26, 2023

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comment from Beta Analytic Testing Laboratory
LCFS Application No. B0394

We thank Beta Analytic Testing Laboratory for taking the time to review our application and provide comments. For background, Chevron's El Segundo California refinery processes soybean oil with petroleum to produce low-carbon fuels including renewable diesel and renewable propane. These fuels result in fewer lifecycle greenhouse gases (GHGs) than fossil fuels and renewable diesel can power the majority of California's existing diesel vehicles.

We understand that Beta Analytic would like us to provide additional information about the ASTM method for determining the biobased content of our products using radiocarbon analysis. The renewable fraction for our fuel products is determined by employing a third-party laboratory that employs Method B from the latest version of ASTM D6866 (AMS Method). Other methodologies may be approved by ASTM in the future, in which case we will consult with the regulator and evaluate the appropriateness of using them for this pathway.

We follow EPA and CARB's guidelines and have worked with both agencies to ensure that the appropriate testing methodologies for quantifying the renewable contents of finished products are applied.

At Chevron, we believe the future of energy is lower carbon. We leverage our strengths to safely deliver lower carbon energy to a growing world.

Regards,

A handwritten signature in black ink, appearing to read "D Gilstrap".



Chevron Products Company
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