

EXHIBIT B

emission factors

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We are getting calls from reporters who are forwarding a “q&a” document explaining the revised emission factors, which include the statement below. I can't find a copy of this document on your website – the reporters are telling us it's something you are emailing to them directly. Do you normally do that without either posting the document or giving a copy to the other parties in a consent decree?

What sectors do these factors apply to?

These factors do not apply to oil and gas operations, including flares at drilling sites and other operations. The updates cover certain processes, including flaring, at petroleum refineries.

These emissions factors were updated or developed for the chemical manufacturing and refining sector, not for the oil and gas production sector, so these factors would not be expected to have an impact on emission estimates for the oil and gas sector. While we are aware of the fact that people in the oil and gas production sector may use these factors at their own discretion, we do not recommend their use, as many of the flares in the oil and gas sector vary from the types of flares from which we collected data to develop the factors. Additionally, some sources in the oil and gas sector are not required to achieve the same level of control as the refining and chemical manufacturing sectors, and as such, it is not expected that the emission profiles of those sources would be equivalent to the sources used to develop these emissions factors.