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Proposed Regulation of the Nevada Department of Agriculture;

William Striejewski
Nevada Department of Agriculture
2150 Frazer Avenue
Sparks, NV 89431

Dear Mr. Striejewski:

Chevron appreciates the opportunity to provide comment on the proposed changes to Chapter 590 of the Nevada Administrative Code. Chevron is a fully integrated oil company that operates petroleum refineries in both California and Utah and supplies petroleum products to Nevada. We have a long track record of participating in discussions with the staff and the Board of Agriculture on proposed fuel regulatory amendments, with our viewpoint invariably focused on protecting fuel quality standards for the motoring public of Nevada.

We have comments to the changes referenced for Section 1. NAC 590.059.

Our understanding of the purpose of adding the amendment to section NAC 590.059 is to address the issue of 85 AKI gasoline being sold as Regular grade outside the northeastern part of the state (Area V, as described in the Appendix of ASTM D4814), and is in response to recent retail activity in the western part of the state.

ASTM D4814, through an industry vetted process based on scientific evidence, provides Antiknock Index value recommendations in order to maintain vehicle performance loss at both typical and high altitude regions. In Nevada, the area east of 117 degrees longitude and north of 38 degrees latitude is included in high altitude Area V. Based on the information provided:

- A minimum Antiknock Index of 87 should be applied outside the area of this State which is east of the 117th degree of west longitude and north of the 38th degree of north latitude
- A minimum Antiknock Index of 85 should be applied within the area of this State which is east of the 117th degree of west longitude and north of the 38th degree of north latitude

Lowering the antiknock rating can result in loss of performance and in severe circumstances loss of power and potential for damage to the engine, as discussed in ASTM D4814, Appendix X1.

In view of the above, Chevron recommends that the amendment to NAC 590.059 be modified to:

3. Based on the requirements set forth in subsections 1 and 2, the grade of any gasoline or blend of gasoline and ethanol that is sold outside of the area of this State which is east of the 117th degree of west longitude and north of the 38th degree of north latitude must be expressed as follows: have a Minimum Antiknock Index of 87.

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By specifying a minimum AKI for the part of the state outside of Area V, Nevada's Administrative Code will still accomplish the purpose of the amendment and maintain consistency with ASTM D4814 in the most direct simplistic manner possible. Similar minimum AKI requirements are in place in Oregon, California, and Arizona – although Oregon and Arizona do go the additional step to provide minimum AKI requirements for all three grades of gasoline. We are opposed to adding the Economy Grade as described in the amendment as this would legitimize the practice of selling sub-octane fuel, which has the potential to negatively impact consumers.

We greatly appreciate the opportunity to comment on the proposed regulations, and look forward to responding to any questions you may have.

Sincerely,



Original sent via e-mail
Matthew (Matt) Sheehan

cc: Nick Economides, Chevron Products Company