



May 23, 2022

The Honorable Joseph R. Biden, Jr.
President of the United States
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500
c/o Office of Legislative Affairs

Dear President Biden:

On behalf of the Ohio Oil & Gas Association, I write to you today to express my concerns with the federal Renewable Fuel Standard (RFS) program; specifically its negative impacts on consumer fuel costs and independent refiners.

The Ohio Oil & Gas Association is a trade association with members representing the people and companies directly responsible for the production of crude oil, natural gas, and associated products in Ohio. Our members remain concerned with the implementation of the RFS as it is not currently operating as originally intended.

Since the inception of the RFS, the United States has undergone a fundamental transformation to become energy independent, resulting in significant benefits for consumers, businesses, the economy, and our national security. Much of that transformation has taken place in Ohio and the Appalachian region. However, certain elements of the RFS seek to undo these gains and are contributing to high consumer fuel costs and, if unaddressed, will threaten the longer-term viability of independent refineries in our region.

A good example of one of the many challenges unanticipated by the RFS are RIN credits. The RFS' intent was to incorporate more renewables into our domestic fuel supply and reduce our reliance on foreign energy. The predominate biofuel mandated, ethanol, can only be mixed into gasoline at the large-scale blending and distribution terminals, where all fuel components are mixed together for "last mile" delivery to gasoline station. However, U.S. EPA requires all refiners comply with the biofuel mandate, even if they do not own large-scale blending facilities. As a result, many refiners must purchase compliance credits – RINs – in an unregulated and nontransparent market. RINs were only intended to cost pennies on the dollar but reached nearly \$2.00 per credit last year and are now trading at roughly \$1.60 per credit. These costs add up as many refiners now spend more on RINs than they do on all other operating expenses combined. Additionally, RINs are currently adding 20-30 cents per gallon to the cost of manufacturing fuel. At a time when consumers need relief at the pump the most, government should look to get excessively high RIN costs under control.

Unfortunately, U.S. EPA's proposed RFS requirement for 2022 continue to move the nation in the opposite direction. We urge the administration ensure that the 2022 RVO is set to a reasonable level and encourage more serious reforms to truly address the inadequacies of the

current RFS. Without immediate action, we face risking our energy independence, something Ohio and our country cannot afford.

We appreciate your time and attention to this important matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Rob Brundrett". The signature is fluid and cursive, with the first name "Rob" being more prominent.

Rob Brundrett
President, Ohio Oil & Gas Association

CC: Ron Klain, White House Chief of Staff
Michael Regan, EPA Administrator
Brian Deese, Director, National Economic Council
Marty Walsh, Secretary of Labor
Dan Utech, Chief of Staff, EPA
Seth Harris, Senior Advisor Labor Policy
Cedric Richmond, Senior Advisor and Director of Public Engagement
Governor Mike DeWine, Ohio
U.S. Senator Rob Portman
U.S. Senator Sherrod Brown