

September 18, 2019

VIA ELECTRONIC SUBMISSION

James C. Owens
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

Andrew R. Wheeler
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Attn: Docket No. EPA-HQ-OAR-2018-0283
Docket No. NHTSA-2018-0067
Docket No. NHTSA-2017-0069

RE: Supplemental Comment of Environmental Defense Fund on the Environmental Protection Agency’s and the National Highway Traffic Safety Administration’s Proposed Rule, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks

Environmental Defense Fund respectfully submits this supplemental comment on the Environmental Protection Agency’s (EPA) and National Highway Traffic Safety Administration’s (NHTSA) Proposed Rule, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks, 83 Fed. Reg. 42,986 (Aug. 24, 2018) (“Proposed Rule”).

In the Proposed Rule, NHTSA declares that “[t]he world has changed, and the need of the U.S. to conserve energy may no longer disproportionately outweigh other statutorily-mandated considerations.”¹ As detailed in earlier comments, NHTSA’s unsubstantiated contention contravenes Congress’ intent that NHTSA strive towards increased energy conservation.² This weekend’s attack on Saudi oil infrastructure is the latest example that NHTSA’s claim is incorrect: world oil markets remain volatile and protecting Americans from oil price spikes remains an important, congressionally-mandated goal. The agencies must withdraw the proposal to roll back clean car standards that spur fuel efficiency gains and thereby insulate Americans from oil market instability.

¹ 83 Fed. Reg. at 43,226.

² See Comments of Center for Biological Diversity, Conservation Law Foundation, EarthJustice, Environmental Defense Fund, Environmental Law and Policy Center, Natural Resources Defense Council, Public Citizen, Inc., Sierra Club, and Union of Concerned Scientists on EPA & NHTSA’s Proposed SAFE Rule, Appendix A, Section IV(A) (Oct. 26, 2018), Docket ID EPA-HQ-OAR-2018-0283-5070 (hereinafter “NGO Comments”).

On Sept. 14, 2019, two major Saudi Aramco oil processing facilities were attacked, leading to the suspension of production of 5.7 million barrels daily of crude oil,³ equal to nearly half of Saudi Arabia's average daily oil production and about 5% of daily global oil production.⁴ In the aftermath of the attack, global crude prices soared by 14.6% that day, apparently the largest jump in over 30 years.⁵ At least some reports suggest that the reduction in the facilities' output could go on for weeks or even months.⁶

The following day, President Donald Trump tweeted that the U.S. was "locked and loaded depending on verification" of the attack,⁷ raising the possibility of further conflict in the Persian Gulf region. U.S. Secretary of Defense Mike Pompeo called the attack "an unprecedented attack on the world's energy supply."⁸

This attack is an example of the inherent volatility of gasoline prices and vulnerability of oil infrastructure. Moreover, it is a reminder of the continued importance of the congressional goals articulated in the Energy Policy and Conservation Act, because policies that reduce the oil intensity of the economy through increased efficiency remain the best policies to protect Americans from inexorable oil price spikes. NHTSA arbitrarily and improperly weighed this factor in the Proposed Rule.⁹ The harmful impacts of the rollback would be far greater than accounted for in the agency's analysis and its unlawful approach will leave Americans more vulnerable in an unpredictable global market. For this and the additional reasons articulated in previous comments, the Proposed Rule must be withdrawn.

* * *

Please contact Alice Henderson at ahenderson@edf.org or 303-447-7205 if you have any questions regarding this comment.

Respectfully submitted,

Environmental Defense Fund

³ Saudi Aramco, "Incidents at Abqaiq and Khurais," (Sept. 14, 2019), <https://www.saudiaramco.com/en/news-media/news/2019/incidents-at-abqaiq-and-khurais>. (Attachment A)

⁴ U.S. Energy Information Administration, "The 10 largest oil producers and share of total world oil production in 2018," accessed September 16, 2019, <https://www.eia.gov/tools/faqs/faq.php?id=709&t=6>. (Attachment B)

⁵ Laila Kearney, "Oil jumps nearly 15% in record trading after attack on Saudi facilities," Reuters (Sept. 15, 2019), <https://www.reuters.com/article/us-global-oil/oil-prices-surge-nearly-20-after-attack-on-saudi-facilities-idUSKBN1W00UG>. (Attachment C)

⁶ Anthony DiPaola, Javier Blas and Will Kennedy, "Aramco to Face Weeks Without the Majority of Abqaiq's Oil Output," Bloomberg (Sept. 16, 2019), <https://finance.yahoo.com/news/aramco-face-weeks-without-majority-172923310.html>. (Attachment D)

⁷ Donald Trump (@realDonaldTrump), Twitter (Sept. 15, 2019, 4:50 PM), <https://twitter.com/realDonaldTrump/status/1173368423381962752>. (Attachment E)

⁸ Eric Schmitt, Farnaz Fassihi and David D. Kirkpatrick, "Saudi oil attack photos implicate Iran, U.S. says; Trump hints at military action," The New York Times (Sept. 15, 2019), <https://www.nytimes.com/2019/09/15/world/middleeast/iran-us-saudi-arabia-attack.html>. (Attachment F)

⁹ For further discussion, see NGO Comments at 50-54.

ATTACHMENT A

Incidents at Abqaiq and Khurais

DHAHRAN, September 14, 2019



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Saudi Aramco emergency crews contained fires at its plants in Abqaiq and Khurais, as a result of terrorist attacks with projectiles. These attacks resulted in production suspension of 5.7 million barrels of crude oil per day.

After visiting the incident locations, Amin H. Nasser, Saudi Aramco President & CEO, said: "We are gratified that there were no injuries. I would like to thank all teams that responded timely to the incidents and brought the situation under control. Work is underway to restore production and a progress update will be provided in around 48 hours."

The company will release additional information as it becomes available. For updates, visit our website at www.saudiaramco.com or contact International.media@aramco.com

Media contact information

All media enquiries are handled by Saudi Aramco's Corporate Communications Department, Dhahran, Saudi Arabia.

International: international.media@aramco.com

Domestic: domestic.media@aramco.com

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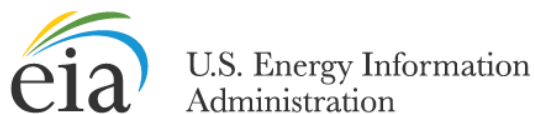


Social media



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ATTACHMENT B



Frequently Asked Questions

What countries are the top producers and consumers of oil?

The 10 largest oil¹ producers and share of total world oil production² in 2018³

Country	Million barrels per day	Share of world total
United States	17.87	18%
Saudi Arabia	12.42	12%
Russia	11.40	11%
Canada	5.27	5%
China	4.82	5%
Iraq	4.62	5%
Iran	4.47	4%
United Arab Emirates	3.79	4%
Brazil	3.43	3%
Kuwait	2.87	3%
Total top 10	70.96	70%
World total	100.66	

¹ Oil includes crude oil, all other petroleum liquids, and biofuels.

² Production includes domestic production of crude oil, all other petroleum liquids, biofuels, and refinery processing gain.

³ Most recent year for which data are available when this FAQ was updated.

The 10 largest oil¹ consumers and share of total world oil consumption in 2016²

Country	Million barrels per day	Share of world total
United States	19.69	20%
China	12.79	13%
India	4.44	5%
Japan	4.01	4%
Russia	3.63	4%
Saudi Arabia	3.30	3%
Brazil	2.98	3%
South Korea	2.61	3%
Canada	2.47	3%
Germany	2.38	2%
Total top 10	58.31	60%
World total	96.92	

¹ Oil includes crude oil, all other petroleum liquids, and biofuels.

² Most recent year for which data are available when this FAQ was updated.

Learn more:

[International Energy Statistics: Total oil production](#)

International Energy Statistics: Total oil consumption

Energy Explained: Where our oil comes from

Last updated: April 22, 2019

Other FAQs about Oil/Petroleum

- Does EIA have county-level energy production data?
- Does EIA have data on U.S. oil refineries and their locations?
- Does EIA have data on the movement (transport) of crude oil, petroleum products, fuel ethanol, and biodiesel by rail?
- Does EIA have data on the type or quality of crude oil?
- Does EIA have information on U.S. natural gas and oil pipelines?
- Does EIA have projections for energy production, consumption, and prices for individual states?
- Does the world have enough oil to meet our future needs?
- How many gallons of gasoline and diesel fuel are made from one barrel of oil?
- How much coal, natural gas, or petroleum is used to generate a kilowatthour of electricity?
- When was the last refinery built in the United States?
- How much of the crude oil produced in the United States is consumed in the United States?
- How much oil consumed by the United States comes from foreign countries?
- How much oil is consumed in the United States?
- How much oil is used to make plastic?
- How much petroleum does the United States import and export?
- How much shale (tight) oil is produced in the United States?
- What are petroleum products, and what is petroleum used for?
- What countries are the top producers and consumers of oil?
- What do I pay for in a gallon of gasoline and diesel fuel?
- What is U.S. electricity generation by energy source?
- What is the difference between crude oil, petroleum products, and petroleum?
- What is the outlook for home heating fuel prices this winter?
- What types and amounts of energy are produced in each state?

ATTACHMENT C

**BUSINESS NEWS**

SEPTEMBER 15, 2019 / 4:21 PM / 2 DAYS AGO

Oil jumps nearly 15% in record trading after attack on Saudi facilities

Laila Kearney



NEW YORK (Reuters) - Oil ended nearly 15% higher on Monday, with Brent logging its biggest jump in over 30 years amid record trading volumes, after an attack on Saudi Arabian crude facilities cut the kingdom's production in half and fanned fears of retaliation in the Middle East.

LIVE

Fed Chair Powell discusses rate cut decision

FILE PHOTO: Oil pours out of a spout from Edwin Drake's original 1859 well that launched the modern petroleum industry at the Drake Well Museum and Park in Titusville, Pennsylvania U.S., October 5, 2017. REUTERS/Brendan McDermid/File Photo

The attack heightened uncertainty in a market that had become relatively subdued in recent months and now faces the loss of crude from Saudi Arabia, traditionally the world's supplier of last resort. A gauge of oil-market volatility hit its highest level since December of last year, and trading activity showed investors expect higher prices in coming months.

Brent crude, the international benchmark, settled at \$69.02 a barrel, rising \$8.80, or 14.6%, its biggest one-day percentage gain since at least 1988. Brent futures saw more than 2 million contracts traded, an all-time daily volume record, Intercontinental Exchange spokeswoman Rebecca Mitchell said.

U.S. West Texas Intermediate (WTI) futures ended at \$62.90 a barrel, soaring \$8.05, or 14.7% - the biggest one-day percentage gain since December 2008.

"The attack on Saudi oil infrastructure came as a shock and a surprise," said Tony Headrick, an energy market analyst at St. Paul, Minnesota, commodity brokerage CHS Hedging LLC. "I think the tables abruptly shifted in the way of the supply outlook and caught many who were short off-guard."

Saudi Arabia is the world's biggest oil exporter and, with its comparatively large spare capacity, has been the supplier of last resort for decades.

RELATED COVERAGE

Saudi attacks threaten U.S. gasoline price hikes, particularly in California

Factbox: Saudi oil attack puts spotlight on global emergency stockpiles

The weekend attack on state-owned producer Saudi Aramco's crude-processing facilities at Abqaiq and Khurais cut output by 5.7 million barrels per day and threw into question its ability

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Fed Chair Powell discusses rate cut decision

to maintain oil exports. The company has not given a specific timeline for the resumption of full output.

Two sources briefed on Aramco's operations said a full return to normal production "may take months."

"I don't think there really is enough to offset what is going to be offline here for a period of time, and you don't even know the quantity of time," said Joe McMonigle, energy analyst at Hedgeye Research.

U.S. intelligence officials said Monday that evidence pointed to Iran being behind the attack, raising the specter of a response that could further unsettle world markets and global supply.

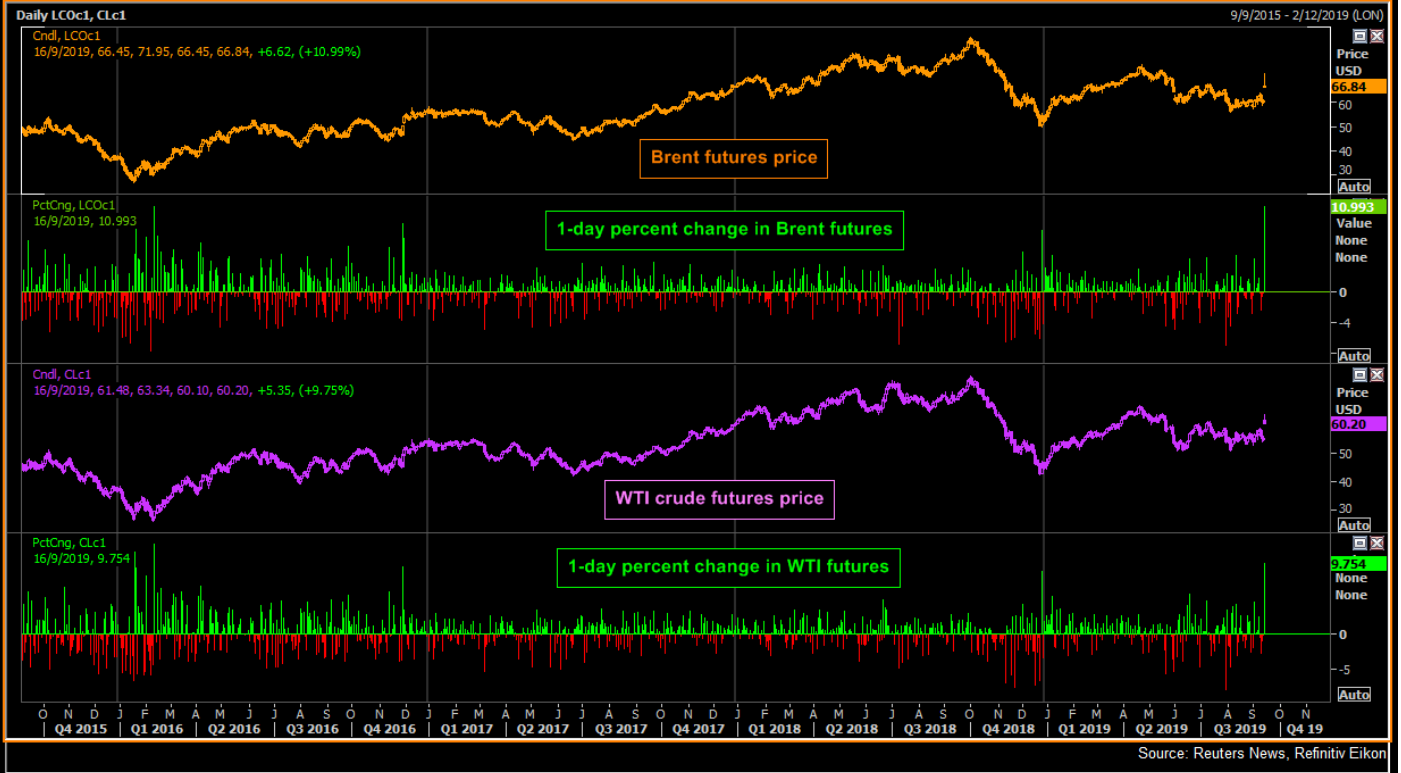
President Donald Trump said he was in "no rush" to respond, however, as he awaited more details. That marked a shift in tone from a tweet sent by Trump on Sunday, when he said the United States was "locked and loaded" and ready to respond..

The Chicago Board Options Exchange's Crude Oil Volatility Index, a gauge of options premiums based on moves in the U.S. oil exchange traded fund, rose to 77.17, its highest level since December last year.

(GRAPHIC: Global oil prices spike over 10% after attacks on Saudi Arabia oil facilities - [here](#).)

Global oil prices spike over 10% after attacks on Saudi Arabia oil facilities

Benchmark Brent and WTI crude oil futures markets both surged more than 10% following drone attacks on Saudi oil facilities on Saturday



The attacks and subsequent hit to supply are likely to keep prices elevated for some time. Crude cargo booking activity and freight rates for shipments from the U.S. Gulf Coast rose over the weekend and on Monday, a ship broker said, and regional Gulf crude prices traded over-the-counter were higher in anticipation of bids for more U.S. shipments.

The United States exports about 3 million barrels of oil a day and could boost those shipments further.

Major importers of Saudi crude, such as India, China, Japan and South Korea, will be the most vulnerable to any supply disruption. South Korea has already said it would consider releasing oil from its strategic reserves.

Trump approved the release of oil from the U.S. Strategic Petroleum Reserve, which holds more than 640 million barrels of crude oil.

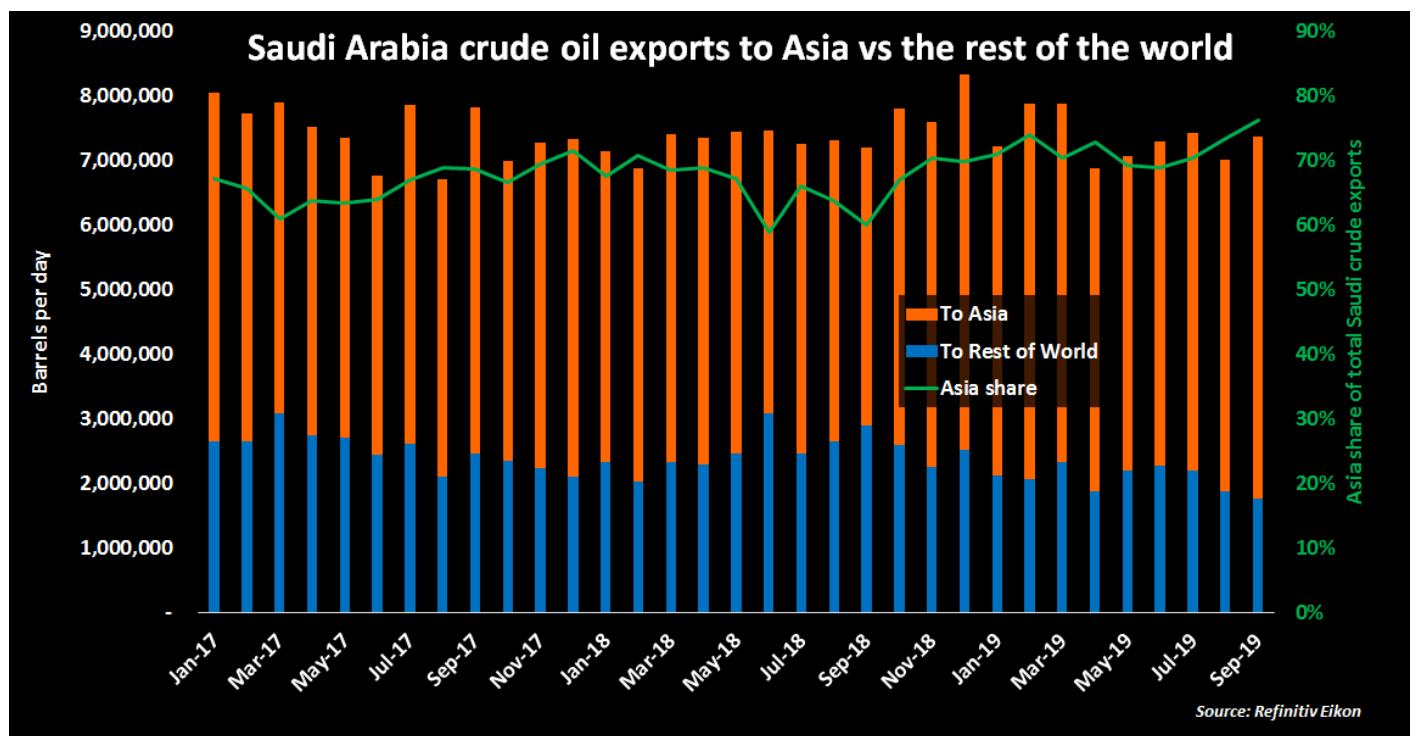
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Saudi oil exports will continue as normal this week as the kingdom taps into stocks from its large storage facilities, an industry source briefed on the developments told Reuters. Still, the attack has raised concerns about how long the kingdom will be able to maintain oil shipments and launched a scramble by refiners in leading Asian consumer countries to find alternatives.

The initial surge in prices Sunday was the biggest for Brent crude since the 1990-1991 Gulf crisis, before pulling back as various nations said they would tap emergency supplies to keep the world supplied with oil.

Members of the International Energy Agency are required to keep 90 days of imports in storage to offset supply shocks.

(GRAPHIC: Saudi Arabia crude exports to Asia vs rest of the world - [here](#))



Additional reporting by Koustav Samanta in Singapore, Sabina Zawadzki and Dmitry Zhdannikov in London, Jessica Resnick Ault and Devika Krishna Kumar in New York, and Collin Eaton in Houston; Editing by Manjivita Chou, Alistair Bell and Tom Brown

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ATTACHMENT D

Markets

Aramco to Face Weeks Without the Majority of Abqaiq's Oil Output

By [Anthony Dipaola](#), [Javier Blas](#), and [Will Kennedy](#).

September 16, 2019, 10:37 AM MDT

Updated on September 17, 2019, 2:09 AM MDT

-
- ▶ Majority of Abqaiq output to be offline for weeks or months
 - ▶ Attack cut Saudi output 50%; kingdom restarting idled fields
-



Oil Analyst Sen: Saudi Strike Puts Geopolitical Risk Back in Market

Saudi Aramco could take months to restore output at its giant Abqaiq plant, keeping up pressure on oil prices as the geopolitical consequences of the worst single attack on global supplies continued to reverberate.

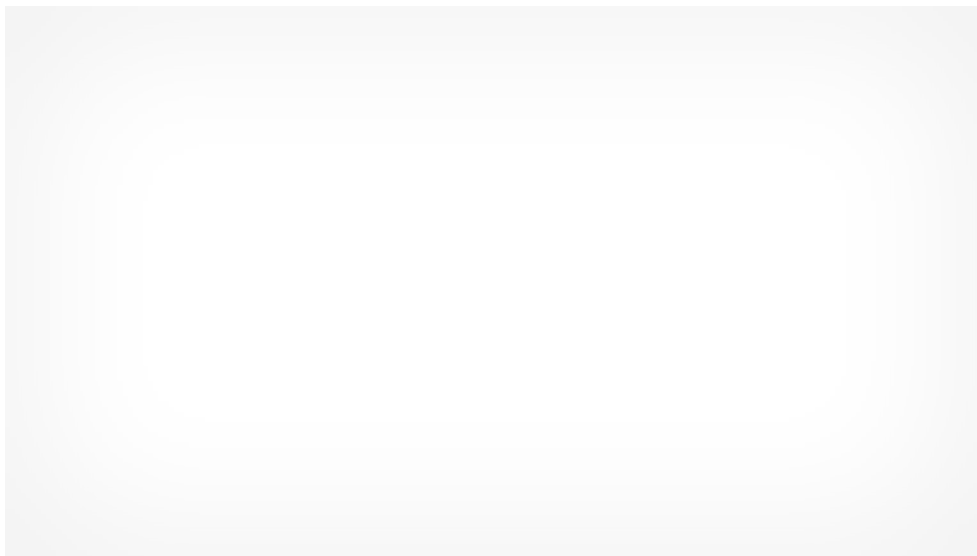
Brent crude traded just under \$69 a barrel after jumping the most on record on Monday. President Donald Trump said “we pretty much already know” who was responsible, signaling Iran was to blame for the attack. Saudi Arabia has said Iranian weapons were used.

Oil prices surged on the prospect of more conflict in the region, as well as on the supply shock. The question now is how quickly the kingdom can recover from the devastating strike, which knocked out half its production, or roughly 5% of global supply. Saudi Arabian officials told a senior foreign diplomat they face a “severe” disruption measured in weeks and months.



Smoke rises from two major oil installations in eastern Saudi Arabia. *Photographer: Orbital Horizon/Gallo Images via Getty Images*

Saudi Arabia's Foreign Ministry said Monday that the attack cut oil production by 50%. While Aramco is still assessing the state of the plant and the scope of repairs, it currently believes less than half of the plant's capacity can be restored quickly, said people familiar with the matter, who asked not to be identified because the information isn't public.



“Damage to the Abqaiq facility is more severe than previously thought,” said Amrita Sen, chief oil analyst at Energy Aspects Ltd. “While we still believe up to 50% of the 5.7 million barrels a day of output that has been disrupted could return fairly swiftly, full resumption could be weeks or even months away.”

The loss of Abqaiq, which handles 5.7 million barrels of oil a day, or about half of Saudi production, is the single worst sudden disruption to the oil market. Saudi Aramco is firing up idle offshore oil fields -- part of its cushion of spare capacity -- to replace some of the lost production, one person said. Aramco customers are also being supplied using stockpiles, though some buyers are being asked to accept different grades of crude oil. The kingdom has enough domestic inventories to cover about 26 days of exports, according to consultant Rystad Energy A/S.

Saudi Stockpiles

Kingdom has about 26 days of crude exports in storage, Rystad says

Source: JODI, Rystad Energy

Note: 26-day figure based on domestically-held stocks, not overseas inventories

In an extraordinary trading day on Monday, London’s Brent crude leaped a record \$12 in the seconds after opening, later settling 15% higher at just above \$69, the biggest one-day percentage gain since the contract began trading in 1988.





Damage to Aramco's facility in Abqaiq, Saudi Arabia.

Lengthy Repairs

Abqaiq's stabilization towers, which separate gaseous compounds from crude oil, could take the longest to repair, said Phillip Cornell, a former senior corporate planning adviser to Aramco. "They can take weeks or months to get specialized parts," he said at an event hosted by the Atlantic Council in Washington.

Five out of 18 stabilization towers appear to have been taken out and the pictures that have been released show "very specific, accurate targeting of those particular infrastructures," Cornell said.

In addition to the immediate loss of supply, the attack raised the specter of U.S. retaliation against Iran, which it blamed for the strike. While Iran-backed Houthi rebels in Yemen claimed responsibility for the assault, which they said was carried out by a swarm of 10 drones, several administration officials Sunday said they had substantial evidence Iran was directly responsible.





Damage to infrastructure Source: U.S. Government/Digital Globe via Getty Images

President Donald Trump promised on Monday to help allies following attacks on major Saudi Arabian oil facilities, even though he said the U.S. is no longer directly reliant on Middle Eastern oil and gas and has few tankers there.

A Saudi military official said Monday that preliminary findings show that Iranian weapons were used in the attacks but stopped short of directly blaming the Islamic Republic for the strikes.

[To see the photos that show how the attack crippled Saudi Arabia' output, click here.](#)

Responsible for almost a 10th of global crude output, Saudi Arabia has been under siege this year -- targeted by air, sea and land -- as tensions with Iran flare. The Houthi rebels said on Monday that oil installations in the kingdom will remain among their targets. The Iranian-backed rebel group, cited by the Houthi's television station, said its weapons can reach anywhere in the country.

“No matter whether it takes Saudi Arabia five days or a lot longer to get oil back into production, there is but one rational takeaway from this weekend's drone attacks on the Kingdom's infrastructure -- that infrastructure is highly vulnerable to attack, and the market has been persistently mispricing oil,” Citigroup Inc.'s Ed Morse wrote in a research note.

Rescue Team

Other OPEC+ members have limited ability to offset the supply losses in Saudi Arabia

Source: International Energy Agency

Note: For non-OPEC members, the IEA does not provide an estimate, so spare capacity is calculated by subtracting August production from October output

Trump authorized the release of oil from the U.S. Strategic Petroleum Reserve, while the International Energy Agency, which helps coordinate industrialized countries' emergency fuel stockpiles, said it was monitoring the situation.

The Organization of Petroleum Exporting Countries is in regular contact with the Saudi authorities, who have risen to the challenge by keeping oil flowing, the group's Secretary-General Mohammad Barkindo said in a Bloomberg TV interview. It's premature to talk about reversing the oil-production cuts implemented by OPEC and its allies, he said.

Even if OPEC+ did decide to roll back their cuts, they would only be able to add about 900,000 barrels a day to the market, just a fraction of the Saudi losses, according to Bloomberg calculations based on IEA data.

– *With assistance by Christopher Sell, and Evan Sully*

(Releads story.)

In this article

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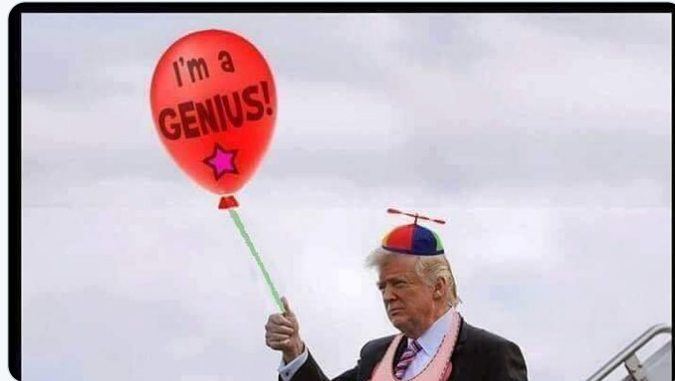
Saudi Arabia oil supply was attacked. There is reason to believe that we know the culprit, are locked and loaded depending on verification, but are waiting to hear from the Kingdom as to who they believe was the cause of this attack, and under what terms we would proceed!

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Private Joker, USMC @Infantry0300 · Sep 15
Replying to @realDonaldTrump
No one believes you



64 209 1.6K



JULIAN SVENDSEN @JulianSvendsen · Sep 15
Replying to @realDonaldTrump
Do you support our POTUS? (Please help by retweeting and following after voting!) bit.ly/MAGASticker bit.ly/EnterFlowState [#Ads](http://bit.ly/WhyPolls)

Yes No

7,267 votes · 4 days left

162 348 184



David Wohl @DavidWohl · Sep 15
Replying to @realDonaldTrump
All the international terrorism promoted, funded and fomented by the Iranian savages - including the attacks on the Saudi oil fields was made so much easier thanks to Barack Obama's GIFT of \$150 billion to the warmongering Mullahs!

That's a FACT.

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D Villella @dvillella · Sep 15
Replying to @realDonaldTrump
You didn't believe they killed Jamal Khashoggi. Why should we believe anything they say about the attack?



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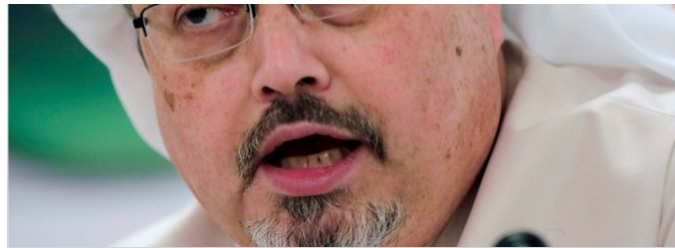
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Woodswoman @MadamZolar · Sep 15
The 9/11 attackers were Saudis; they played Bush and now they're playing Trump. 🇺🇸

99 95 991

1 more reply



MatthewJshow @MatthewJshow · Sep 15
Replying to @realDonaldTrump
President Trump will make the right decision on this evolving situation!

599 86 752



John Pilmur MD 🇺🇸 @leeF787 · Sep 15
Replying to @realDonaldTrump
The latest poll numbers show that President Trump will cruise to an easy victory in 2020.

272 39 387



John Pilmur MD 🇺🇸 @leeF787 · Sep 15
Replying to @realDonaldTrump
Americans have seen a massive increase in their paychecks thanks to President Trump. We thank you sir. #TrumpSupporters

316 42 305



Nick Adams @NickAdamsinUSA · Sep 15
Replying to @realDonaldTrump
Thank you for your diligence, Mr. President!

703 192 987

You work so hard for the American people!



Jeff Tiedrich @itsJeffTiedrich · Sep 15
Replying to @realDonaldTrump
rest easy, citizens! President Weak And Dumb is going to do what he always does: shout empty threats, ignore the experts and make everything worse. can't wait!

206 662 7.9K



Eugene Gu, MD @eugenegu · Sep 15
Replying to @realDonaldTrump
Saudi Arabia spent billions in advanced air defenses to stop jet fighters when they should've been looking out for cheap ass drones from Radio Shack. They should take the L and learn to be better next time. Also, spend less time killing a guy about to get married with a bone saw.

124 903 7.2K



David Wohl @DavidWohl · Sep 15
Replying to @realDonaldTrump
Obama should not have given one cent to the Iranians before they signed an agreement to (1) End global terrorism (2) Acknowledge Israel's right to exist and (3) Release every single American hostage they have in their captivity. Obama required nothing. What a disgrace!



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ATTACHMENT F

Saudi Oil Attack Photos Implicate Iran, U.S. Says; Trump Hints at Military Action

By **Eric Schmitt**, **Farnaz Fassihi** and **David D. Kirkpatrick**

Published Sept. 15, 2019 Updated Sept. 16, 2019

The Trump administration intensified its focus on Iran Sunday as the likely culprit behind attacks on important Saudi Arabian oil facilities over the weekend, with officials citing intelligence assessments to support the accusation and President Trump warning that he was prepared to take military action.

The government released satellite photographs showing what officials said were at least 17 points of impact at several Saudi energy facilities from strikes they said came from the north or northwest. That would be consistent with an attack coming from the direction of the northern Persian Gulf, Iran or Iraq, rather than from Yemen, where the Iranian-backed Houthi militia that claimed responsibility for the strikes operates.

[Investigation: Who was behind the Saudi oil attacks? What the evidence shows.]

Administration officials, in a background briefing for reporters as well as in separate interviews on Sunday, also said a combination of drones and cruise missiles — “both and a lot of them,” as one senior United States official put it — might have been used. That would indicate a degree of scope, precision and sophistication beyond the ability of the Houthi rebels alone.

Mr. Trump, however, did not name Iran, saying he needed to consult with Saudi Arabia first.

“Saudi Arabia oil supply was attacked,” he said in a tweet on Sunday evening. “There is reason to believe that we know the culprit, are locked and loaded depending on verification, but are waiting to hear from the Kingdom as to who they believe was the cause of this attack, and under what terms we would proceed!”

Secretary of State Mike Pompeo said Saturday that Iran was behind what he called “an unprecedented attack on the world’s energy supply” and asserted that there was “no evidence the attacks came from Yemen.” He did not, however, say where they came from, and the Saudis refrained from directly blaming Iran.

Saudi Oil Facilities Attacked



By The New York Times

The administration’s determination that Iran played a direct role in the attack marked a significant escalation in months of back-and-forth tensions between the United States and Iran. It raised questions about how Washington might retaliate — and why Iran would have risked such a confrontation.

Mr. Trump's warning echoed one he made in June after Iran shot down an American surveillance drone. He said then that the military had been "cocked and loaded" for a strike against Iran.

He said he called off the strike with 10 minutes to spare when a general told him that 150 people would probably die in the attack, which he said would have been disproportionate.

Administration officials said on Sunday they would seek to declassify more intelligence to buttress their case against Iran in the coming days. The satellite photographs released on Sunday did not appear as clear cut as officials suggested, with some appearing to show damage on the western side of the facilities, not from the direction of Iran or Iraq.

American officials said that more than 17 weapons were directed at the Saudi facilities, but not all reached their targets. Forensic analyses of the recovered weapons could answer questions about what they were, who manufactured them and who launched them.



Secretary of State Mike Pompeo on Saturday accused Iran of being behind "an unprecedented attack on the world's energy supply"
Christopher Smith for The New York Times

Iran forcefully rejected Mr. Pompeo's accusation on Sunday, with the foreign minister dismissing it as "max deceit." The office of the Iraqi prime minister, Adel Abdul-Mahdi, also rejected any suggestion that Iranian operatives carried out the attack from Iraqi territory, saying Iraq would act firmly if its territory were used to attack other countries.

If Iran, or one of its proxies in Iraq or Yemen, carried out the attacks, it would fit into a strategy Iran has followed for months in its escalating confrontation with the Trump administration.

Squeezed by sweeping American sanctions on its oil sales, Iran has sought to inflict a similar pain on its adversaries — threatening the ability of Saudi Arabia and other American allies in the Persian Gulf to sell oil and holding out the possibility of driving up international oil prices in the months before President Trump seeks re-election.

"Iran wants to show that instead of a win-lose contest, Iran can turn this into a lose-lose dynamic for everyone," said Ali Vaez, head of the Iran Project at the International Crisis Group.

Yet Iran has stopped short of carrying out the kind of direct, open attack on United States allies that might trigger a military response, preferring to let regional allies do the work or at least share the blame.

"Plausible deniability is a trademark of Iran's pushback strategy," Mr. Vaez said.

The combination of military pressure and deniability also fits with a strategy of increasing Iran's bargaining power before possible talks at the United Nations this month.

President Emanuel Macron of France has said he hopes the meeting of the United Nations General Assembly, which opens Tuesday, will be an opportunity for de-escalation between the United States and Iran. The recent hostilities began when the Trump administration withdrew last year from an agreement to limit Iran's nuclear program and then this year imposed sweeping sanctions to try to force Iran into a more restrictive covenant.

Several other world powers, including France, also signed the original agreement and still support it, and Mr. Macron has said he hopes to hold talks at the General Assembly about saving the agreement. Mr. Trump said this month that he was open to a possible meeting there with President Hassan Rouhani of Iran.

Even as Iranian diplomats denied any role in the attack, others close to Iran's elite Islamic Revolutionary Guard Corps were reveling in the damage at the Saudi oil facilities, which process the vast majority of the country's crude output.

The Trump administration, said Naser Imani, a former member of the guard's political bureau, should take it as a warning to the United States and its Persian Gulf partners.

A satellite image released by the American government of an oil-processing facility in Abqaiq. Officials said it shows that the attack came from the north or northwest, consistent with an attack from Iran or Iraq, however this photo appears to show damage on the western side of the tanks. U.S. Government/DigitalGlobe, via Associated Press

"If a few Houthis can cause this extensive damage, imagine what Iran could do if it was forced into a military conflict," he said in a telephone interview on Sunday. "Iran has proved in the past few months that it has the will to pull the trigger as well as the military power to do so."

A military strategist with the Revolutionary Guards, speaking on the condition of anonymity for fear of retaliation, also questioned whether the Houthis alone could have carried out such a complex and effective attack without Iranian help.

But whoever carried out the attack, the Iranian strategist said, the message to the West and its regional allies was the same. If the United States strikes Iran, "the flames of war in the Persian Gulf will burn you all," he said.

A senior commander for the Revolutionary Guards insisted that the country was ready for "full-fledged" war, the semiofficial Tasnim news agency reported, according to Reuters.

"Everybody should know that all American bases and their aircraft carriers in a distance of up to 2,000 kilometers around Iran are within the range of our missiles," said Gen. Amir Ali Hajizadeh, the head of the Revolutionary Guards' air force.

How the Trump administration responds remains to be seen. Breaking with a pattern under both Democratic and Republican presidents, the Trump administration has said that it intends to hold Iran fully responsible for any attacks carried out by the Houthis or other regional allies that the administration deems Iranian proxies.

Previous administrations have said that Iran was arming and training allied groups such as the Lebanese militia Hezbollah and Shiite militias in Syria or Iraq to extend its regional influence. Yet in the past, the United States has generally declined to retaliate against Iran militarily even when those groups have attacked the American military, as Iranian-backed Shiite militias did during American occupation of Iraq.

Reporting was contributed by Stanley Reed, Falih Hassan, Michael Wolgelenter and Michael D. Shear.

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