



California Air Resource Board  
1001 1<sup>st</sup> Street  
Sacramento, CA 95814

October 6, 2017

Dear Sir and Madam,

We are pleased to advise that Montana Advanced Biofuels, LLC (MAB) has fully developed and permitted an integrated biorefinery to be constructed at Great Falls, MT. The Project will utilize residual wheat starch and feed quality barley as feedstocks to produce four complimentary products; Vital Wheat Gluten (VWG), Distiller's Dried Grains (DDGS), Barley Hulls and Bran and low carbon Ethanol that qualifies under EPA rules as Advanced Biofuel.

Project technology, design, construction, and operation are provided by ICM, Inc. Colwich, KS.

The plant is expected to commence operations approximately 18 months after the construction start date which is projected to be 2Q 2018.

We understand that ARB plans to adopt the GREET 3.0 mode, Tier 1 starch ethanol calculator, and Temporary FPC without including barley as a feedstock. Please accept this letter as a "placeholder" for our formal application which will be submitted as soon as possible.

We respectfully request that CARB allow consideration of barley as a qualified feedstock to produce Advanced Biofuel upon submission of a formal application by Montana Advanced Biofuels. It has long been our plan to submit a formal application for a New Fuel Pathway for Barley to CARB once plant construction is underway which would provide a firm date for product delivery as well as final engineering details. We have received approval and Advanced Biofuel designation from the US Environmental Protection Agency, please see partial excerpts below from EPA's Nov. 20, 2015 letter of approval, Conclusion Section, pages 13 & 14 which is attached with this letter:

"Based upon our assessment of the information provided in the MAB petition and the analysis presented in the NODA, EPA has determined that ethanol produced from barley feedstock through the MAB Process meets the lifecycle GHG reduction requirements to qualify, under certain conditions, for designation as Advanced Biofuel and D5 RINS".

We will submit a separate application for a New Fuel Pathway for conversion of residual wheat starch to ethanol. We are aware of CARB's recent approval of White Energy's application which has some similarities. We estimate that MAB's CI will be considerably lower than White Energy's Russell, KS CI

because of ICM's modern, energy efficient production processes and by utilizing 100% renewable electricity.

Please consider our unique location ¼ mile from a hydroelectric source which produces renewable electricity. Rainbow Dam is owned and operated by Northwestern Energy. Two 100 KV power lines currently bisect our plant site. We will construct an onsite substation to receive electrical power directly from the line exiting the power house at Rainbow Dam. Northwestern Energy will guarantee that 100% of the electrical power that we purchase is renewable hydro-electricity. We are concerned that the limitations ARB is proposing for low carbon intensity electricity may have the unintended consequence of precluding using this low CI hydropower for process energy.

We will provide further details with our formal application to CARB for New Fuel Pathways for barley and for residual wheat starch including a GREET 3.0 model.

We appreciate your consideration and look forward to your guidance.

Very Best Regards,  
Gary

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