

August 30, 2018

Samuel Wade
Chief, Transportation Fuels Division
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

**RE: COMMENTS ON THE PROPOSED AMENDMENTS TO THE LOW CARBON FUEL STANDARD
REGULATION AND TO THE REGULATION ON COMMERCIALIZATION OF ALTERNATIVE DIESEL FUELS
– AUGUST 13, 2018**

Dear Mr. Wade,

Conestoga Energy Partners, LLC (Conestoga) appreciates the opportunity to comment on the CARB proposed amendments from August 13th. As you know, Conestoga is a low-carbon intensity corn and sorghum ethanol producer that has partnered with CARB since the beginning of the LCFS program to meet California's fuel demands. We continue to support CARB's effort in strengthening the LCFS program to ensure its long-term sustainability and generally support the current LCFS proposed amendments.

Conestoga has used carbon capture and sequestration (CCS) for years at our Arkalon Ethanol and Bonanza Bioenergy ethanol plants in Kansas to voluntarily avoid the atmospheric emission of millions of tons of CO₂ produced during the ethanol fermentation process. Conestoga supports the current CCS protocol and looks forward to working with CARB more closely to be one of its first adopters. We do hope CARB will use an adaptive management strategy to evolve the CCS protocol over time to incorporate lessons learned to simplify the protocol and more closely reflect the performance based standards used now to evaluate fuels.

Finally, we are grateful ARB updated the sorghum farming input values in CA-GREET 3.0. The dataset used in CA-GREET 2.0 was outdated and needed to be changed. The updated values currently in CA-GREET 3.0 are based on data from a statistically significant subset of U.S. sorghum farmers and reflect agronomic recommendations at land grant universities. Thank you.

Thank you for your work and feel free to contact me if you have any questions on our comments.

Regards,



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