



October 24, 2014

California Air Resources Board

1001 "I" Street

Sacramento, CA 95812

ATTN: Mr. Wes Ingram, Manager, Fuels and Evaluation Section

Mr. Chan Phan, Air Resources Engineer

RE: LCFS Program - Comments on Proposed Changes to California GREET Model

Dear Mr. Ingram and Mr. Phan:

Montauk Energy Holdings, LLC ("Montauk") appreciates the opportunity to comment on CARB staff's proposed changes for the California GREET Model under efforts to reauthorize the Low Carbon Fuel Standard (LCFS) regulation.

Montauk is a fully integrated renewable energy company that specializes in the recovery, management and utilization of landfill methane. Montauk currently operates high BTU and power generation landfill gas (LFG) projects in several states across the US. Montauk is currently developing a gas-to-energy facility that will process LFG from the F.R. Bowerman landfill and convert it to electricity. The plant which is expected to be completed and operational by early 2016, will have the capacity to produce enough electricity to serve 14,000 homes in Southern California. As project developer Montauk is committed to the creation of jobs and economic development in California. In addition, as a leading producer of renewable green energy Montauk intends to continue making such contributions to the region as the role of Renewable Natural Gas (RNG) expands in California.

We are writing to indicate our overall support for reauthorization of the LCFS. However, we urgently **request that CARB allow additional time for review of, and potential modifications to, its proposed changes to the CA-GREET model.** As CARB staff have made clear, methane leakage is very complex, and there is much uncertainty with existing data. Significant new data on this and other related issues should be available in the next six to twelve months. It is premature to change the carbon intensity values for natural gas, renewable natural gas, (or any other fuel pathways) before that information becomes available. We, therefore, urge CARB to hold off on updating the CA GREET model in order to allow sufficient time to obtain, review and incorporate emerging, peer-reviewed information about methane leakage (roughly, six to 12 months). As we understand it, CARB can reauthorize the LCFS legislation in February 2015 without rushing to update the CA-GREET model.

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The LCFS has been a positive force for alternative fuels. Montauk strongly believes that it is critically important to improve the science on which this program is based. We therefore respectfully ask CARB to separate out reauthorization of the LCFS from adoption of new CI values in CA-GREET at least until the peer-reviewed data on methane leakage is available and can be fully considered.

Please contact me at (412) 747-8718 or mryan@montaukenergy.com if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Ryan", is positioned above the printed name.

Martin L. Ryan
Vice President