



October 24, 2014

Cal/EPA Headquarters Building
1001 "I" Street
Sacramento, CA 95814

RE: Comments on the LCFS Program - CA-GREET 2.0.

Mr. Ingram and Mr. Pham,

As we have stated in recent comments, White Energy is a Texas and Kansas based ethanol producer currently relying on sorghum for a significant portion of our annual grain usage. Again, we hope to continue to increase both our ethanol shipments to California and our sorghum usage, as we feel sorghum has an important role to play in helping California meet the greenhouse gas reduction goals set by the LCFS and reducing water usage in irrigated agriculture.

We maintain close contact with National Sorghum Producers (NSP) and understand they are submitting comments as well. As NSP does, we strongly encourage you to consider revising the values related to sorghum yield, the sorghum N application rate and the sorghum stover N content. The sorghum stover N content figure is particularly troubling, as it is based on data not comparable to those found in modern commercial sorghum production. As an alternative, we would support NSP's data and suggested changes.

Thank you for the opportunity to comment.

Best Regards,

Carol Tjiong