



**Glacial Lakes
Energy, LLC**

**Corn ♣ Ethanol ♣ Feed
Watertown & Mina, SD**

December 10, 2019

The Honorable Kristi Noem
Office of the Governor
500 East Capitol Avenue
Pierre, SD 57501

Dear Governor Noem:

We are writing to commend you for your recent remarks at the Glacial Lakes Energy annual meeting supporting the use of E30+ high octane low carbon blends in the nation's legacy light-duty fleet. Ever since you announced E30 Day in February of this year on the steps of the State Capitol, you have been leading the charge at the state level to overturn EPA's illegal interpretation of the Section 211(f) "substantially similar" provision.

You may recall that you first announced your commitment to fuel South Dakota's legacy vehicles with E30 in response to a challenge from Doug Sombke and Dave VanderGriend who preceded your remarks at the Glacial Lakes Energy Mina facility's ten-year anniversary open house. Your announcement was a bold move that gave the issue much-needed statewide attention and you fulfilled your commitment when you issued your official E30 Day proclamation on February 19, 2019 of this year.

A number of us have been working with your very capable staff, including Jason Simmons, to support South Dakota's petition to EPA to demonstrate E30 blend benefits in the state fleet's standard vehicles. We are following the Nebraska template initiated by Governor Pete Ricketts and his staff and we expect that other States will follow your leads.

However, media accounts of your recent remarks have caused some confusion that we believe you could help clear up. For example, the *Watertown Public Opinion* piece said that "...Noem reiterated the state government's commitment to fully embrace E30 by using the blend in the state's vehicle fleet. **Noem said the state has begun to embrace the blend by only purchasing flex fuel vehicles.**" (emphasis added)

Governor, as you know—and as we must continue to underscore given the barrage of misinformation and the overall complexity of the issue—the importance of the successful GLE E30 Challenge is that multiple studies show E30 blends work in all standard light-duty vehicles ("legacy vehicles") on the road today. Flex fuel vehicles (FFVs) are not required. It's critical to convey that the more than 260 million cars and trucks on the road today are ready to use 100 RON E30 high octane low carbon fuels—we don't have to wait 15 – 20 years for automakers to resume manufacture of FFVs (which EPA policies have disincentivized) and for the fleet to turn over.

Unless EPA reverses course and recognizes that E30 blends can be legally sold and used in legacy vehicles, our companies and other E30 supporters will challenge EPA's indefensible misinterpretation in the courts. We

expect that challenge will be filed in the first quarter of next year when EPA finalizes the pending SAFE Rule unless they accept our comments to their proposed rule.

We understand that you have been invited to participate in the "Clean Fuels Thought Leaders Forum" on Thursday, February 6, 2020, the day before the National Governors' Winter Meeting. The forum will be held at the UN Foundation headquarters in Washington, DC and will feature experts in the field including former White House Counsel to President George H.W. Bush, Ambassador C. Boyden Gray and internationally recognized experts in public health, agricultural technology advances, and corn ethanol's carbon footprint. Your participation will help to legitimize and elevate the critically important E30 "Clean Octane" issue at the same time as President Trump and the courts are being asked to consider alternative pathways to fulfill RFS targets without having to wait for Congress to break the legislative logjam.

If EPA is finally made to do its job and replace gasoline aromatics with high octane, low carbon ethanol, America's farms will be unleashed to protect America's cities, especially our children. There will be many winners, including farmers and the rural economy.

We hope you can join us next February to talk about how higher-octane fuels can improve the public health and environment, strengthen the nation's economy and trade deficit, and save automakers and consumers billions of dollars annually.

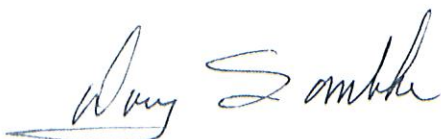
Sincerely,



Jim Seurer, Chief Executive Officer
Glacial Lakes Energy, LLC



Ron Alverson, Board Member
Dakota Ethanol, LLC



Doug Sombke, President
South Dakota Farmers Union



Pam Miller, Board Chair & Director
of Industry and Investor Relations
Siouxland Ethanol, LLC



David VanderGriend, Chief Executive Officer
ICM, Inc

Cc: Larry Pearce, Executive Director, Governors' Biofuels Coalition