Montana Renewables, LLC
FAQs around the UIC Permit Application for Water Injection

- Water comes from washing crop and beef tallow products (nothing to do with oil & gas).
- Water is generated by Montana Renewables LLC who produces renewable transportation fuel from agricultural and ranch feedstocks including vegetable oils, animal fats, and similar materials. These feedstocks have to be washed before we can use them.
- The washwater is non-hazardous, non-corrosive and does not contain radioactive materials.
- Water is then delivered for disposal at the Montalban Oil and Gas Operations injection wells located in Pondera County.
- The water will be injected at a depth of over 3,400 feet below the surface, into an aquifer that is unsuitable for humans, crop irrigation or livestock watering.
- The injection wells are designed to meet EPA's stringent requirements, are monitored continuously to ensure they are operated consistent with the permit requirements and are routinely tested to ensure they do not fail or leak outside of the sealed injection zone.
- Water is received at the injection facility into closed tanks that are leak tested, monitored, and properly diked.
- Montalban family has been doing this for 50 years, and at this location for 20 years.
- Class V injection wells are used extensively across the United States to dispose of non-hazardous fluids, which is what we are doing. EPA estimates there are 650,000 Class V wells in the US. The EPA does extensive analysis across the country to ensure that our environment is protected.

Many agricultural processes like ours use water and are regulated by federal and state laws.

Who is Montana Renewables? https://montanarenewables.com/feedstocks/
We buy renewable feedstocks including vegetable oils like canola oil, soybean oil, distillers corn oil, and animal fats such as beef tallow. We produce renewable products including diesel, sustainable aviation fuel, renewable LPG, and renewable hydrogen.

Why does the Renewable Feedstock operation produce water?
The renewable feedstocks must be cleaned of organic impurities before we can use them. These impurities include phosphorus and nitrogen, common salts such as calcium, potassium, sodium and magnesium, and other non-toxic materials. We built a state of the art Pretreatment Unit (PTU) which uses a water-based (hydrothermal) cleanup process that mixes the feedstock with water and a weak acid (typically citric acid, a naturally occurring acid found in oranges) to remove the impurities. The water is then pH-neutralized for discharge.

What is MRL doing with the PTU water today?
The washwater is injected into EPA-permitted wells out of state.

Which agency regulates Underground Injection Control (UIC) Wells in Montana?
The United States Environmental Protection Agency (EPA) has regulatory authority under the Safe Drinking Water Act to protect our groundwater aquifers. EPA has jurisdiction (primacy) over all UIC wells in the State of Montana (with the exception of Class II UIC wells used for injection of oil and gas production fluids which are regulated by the Montana Board of Oil and Gas Conservation). For all other

types of UIC wells, EPA regulates and oversees their design, operation and maintenance. They require continuous monitoring, regular testing and rigorous reporting of operations to ensure that the well complies with the regulations.

Why is the existing permit of the Jody Field Wells being changed from UIC Class II to UIC Class V?
The UIC Class II category is applicable to injection of water from oil and gas production activities, which is not what we are doing. To be able to accept the water from the MRL PTU, the well classification needs to be changed to UIC Class V, which the EPA has approved.

Why does MRL want to inject the water in a UIC well in Montana?
The current PTU washwater is injected in wells which have the same Class V permit but are out of state. Injecting in Montana will eliminate rail transportation of the water which reduces life cycle carbon dioxide emissions, and also keeps the economic benefits in-State.

Why doesn't MRL send the water to the City of Great Falls Water Treatment Plant?
We are studying that. MRL is working with both the City and a third party engineering company, Ramboll Group, to complete a "treatability study". Following completion of the treatability study, MRL intends to submit a discharge permit application to the City probably in early 2024.

How do you know the PTU washwater is not toxic or hazardous?
The water begins with City of Great Falls municipal drinking water and does not contact any toxic or hazardous material in the process of treating agricultural products. Samples of the water have been independently tested to confirm it was non-hazardous and met the Federal permit requirements. This testing was independently performed by a third party laboratory certified to conduct the EPA test protocols.

How much water does MRL plan to inject into the wells?
Based on their prior use as UIC Class 2 wells, we have been advised by Montalban Oil and Gas (MOGO) that a capacity of at least 1750 barrels per day (73,500 gallons per day) can be expected.

How many trucks a day will bring water to the wells?
Each water truck carries 150 barrels (6,300 gallons) of water. If the wells inject 1750 barrels per day we would expect about a dozen daily trucks.

How long does MRL plan to inject into the wells?
MRL plans to use the Montana wells until a permit for discharge to the City WWTP has been approved (or until another option for on-site processing has been implemented). MRL believes that an on-site processing option, such as discharge to the City WWTP, is overall the best.

Does this affect our groundwater?
No. The deep aquifer where the UIC wells operate is not suitable for human consumption or irrigation which is why it can be used for injection. The EPA's technical review process, well design and permit requirement ensure that there will be no impact to groundwater used for drinking and agricultural purposes.