



Petersen Aviation, Inc.

Auto Fuel STC's
984 K Road
Minden, NE 68959

EXHIBIT 22
DATE 2/10/05
HB 464
Phone 308-832-2050
Fax 308-832-2311
todd@gtmc.net
www.autofuelstc.com

January 31, 2005

Rep. Ed Butcher,
Chairman of the House Agriculture Committee
PO Box 200500
Helena, MT 59620-0500

Dear Senator Butcher:

I am writing to you today in regard to Senate Bill HB 464 (LC1764) regarding the proposal to add ethanol to 100% of motor vehicle gasoline sold in Montana.

My company holds Supplemental Type Certificates (STC) issued by the FAA for the use of automotive fuel in General Aviation airplanes. Unfortunately, fuel containing ethanol is not approved for use under the STC's. There are many technical reasons for this, but depending on the way the legislation is written, it need not be a safety issue for Montana pilots.

My database of STC's sold shows that there are 419 airplanes in Montana which have an auto fuel STC from my company. There will also be a substantial number of other Montana based airplanes using STC's sold by the EAA and a number of homebuilts which also use automotive gasoline. No doubt some of these airplanes have since been sold out of state but regardless, there are large numbers of Montana pilots currently using automotive gasoline in their airplanes. Removing this source of fuel will create a hardship for them given the price of the aviation fuel that they would be forced to use if ethanol is placed in 100% of the automotive fuel in your state.

I applaud the proposal which allows an exemption for use in aircraft. This exemption does not go quite far enough however. Providing a means for aircraft owners to actually obtain that fuel is also necessary. Creating an exemption such as this is a start but it will not assure a ready supply of non-ethanol fuel in and of itself.

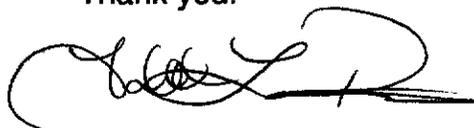
Very few individuals are able to purchase fuel in bulk for their airplanes. Most airports prefer to sell aviation fuel because their profit margin is so very much higher. Obtaining a supply of non ethanol fuel is therefore problematic for most pilots. So as not to eliminate this source of fuel it is important that individuals be able to obtain fuel from any standard service station. If it were possible to exempt one grade of

automotive fuel from the ethanol requirement, then the problem would be solved. In the case of aircraft, if the 91 octane fuel sold in Montana could be exempt, then all of the airplanes that are approved by the FAA to use automotive fuel could safely do so simply by purchasing this premium grade. Without a provision such as this it will be next to impossible for aircraft owners to obtain non-ethanol fuel in your state unless they have enough storage to meet the distributors minimums and of course very few individuals do.

I would also encourage you to include verbiage in this legislation that will require fuel pumps to be labeled in respect to fuel containing ethanol. This simple provision would greatly reduce the risk of introducing ethanol based fuel into an airplane or any other machine that is not suited for it.

Thank you for this opportunity to comment on HB 464 (LC1764). If you have any questions please feel free to contact me at any time.

Thank you.

A handwritten signature in black ink, appearing to read 'Todd L. Petersen', with a large, sweeping flourish extending to the left.

Todd L. Petersen
President