From:	Gunderson, Larry (MDA)
To:	Montgomery, Bruce (MDA); Bruening, Denton (MDA); Kjaersgaard, Jeppe (MDA); Berg, Jeffrey (MDA)
Cc:	Wolf, Katie (MDA)
Subject:	FW: draft nitrogen rule
Date:	Monday, July 17, 2017 12:42:40 PM

Comments on fall fertilizer from one of the farmers that attended the McIntosh meeting. Maybe he works for a dealer, too, or just has a good knowledge of what is occurring in his area.

Larry

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From: Dwight Christian [mailto:tdscti@gvtel.com]
Sent: Monday, July 17, 2017 11:47 AM
To: Gunderson, Larry (MDA) <larry.gunderson@state.mn.us>
Subject: draft nitrogen rule

Hi Larry, I am emailing you what I said at the meeting in McIntosh.
TDS trucking NH3 carrier

1- Drivers are problem year round, to full fil the needs of Anhydrous in just the spring the farmers would be waiting, hazmat drivers are short, period.
2- The 10 day window that wheat and corn go in, it hard enough to keep up with equipment that is out there today. It is not feasible to go buy tankers at $125,000 ea for 10 to 15 days in the spring

TDS Fertilizer retail fertilizer plant

1- We do 40% of our nitrogen fertilizer needs in the fall. The farmers we do are on heavy ground 7-8 miles west of Fertile and 5-6 miles east of Fertile.

Farmers along highway 32 don't use nitrogen in the fall because of the sandy conditions. Farmers also in these areas that we apply in the fall, do split applications of nitrogen, 80% in fall and come back and top dress or side dress
In the summer when needed. Same with spring applied nitrogen , they don't put it all on the come back and top dress or side dress. Farmers want to make the most of their nitrogen use.

2- Application equipment and capable operator's would be short supply. The way it works in the spring and fall for that matter, they call and within an hour you have 5 farmers to spread for and 2000 acres

That day. I feel I can take on more application/fertilizer customers if I have a good fall. With this rule I would be limited to the service I could give, or eliminate some of my customers that I have already.

3- our work force up here is very short and it does not look like it is going to get better any time soon.

Christian Farms

We farm out west where we apply our nitrogen in fall we also farm around Fertile where we apply nitrogen in the spring.

Other than the wheat (1 appl.) we apply at least 3 application to the corn on the sandy ground, about 50% up front and then rest in 2 to 3 thru out the summer.

We don't want to lose any nitrogen and use it all up thru the growing season.

We don't apply on the sand because we know we would lose it, and other farmers have the same practice.

It will be interesting to see where the nitrate levels come in at. Hopefully it will not be needed this rule in our area.

Thanks for coming to McIntosh so you could hear are opinions on this matter.

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