

Approved March 26, 1992
Date

MINUTES OF THE SENATE COMMITTEE ON AGRICULTURE

The meeting was called to order by Sen. Don Montgomery at
Chairperson

10:00 a.m./~~p.m.~~ on March 25, 1992 in room 423-S of the Capitol.

All members were present except:

Sen. Harder

Committee staff present:

Raney Gilliland, Legislative Research
Jill Wolters, Revisor of Statutes
Shirley Higgins, Committee Secretary

Conferees appearing before the committee:

Rebecca Rice, Amoco Production Company
DeVern H. Phillips, State Sealer

The chairman called the committee's attention to copies of written testimony from Robert Thiessen of Jackson Ice Cream Company in opposition to HB 3046 which had been submitted after the hearing on March 23. (Attachment 1).

HB 3079 - Concerning weights and measures; relating to dispensing compressed natural gas.

Rebecca Rice, legislative counsel to the Amoco Production Company, testified in support of the bill. (Attachment 2).

DeVern H. Phillips, State Sealer, testified with no objection to the bill but asked that compressed natural gas be displayed in the units in which it is measured. (Attachment 3).

Sen. Daniels began a discussion of how this is handled by other states. Mr. Phillips said it has fallen through the loopholes in most other states, but his point is that the correct method of sale should not be established by the states but nationally and that compressed natural gas should be displayed in the units in which it is sold. The chairman asked if changing "may" to "shall" in Section 2 (b) would solve the problem. Mr. Phillips answered that he finds a secondary display acceptable, and this could be required as the bill is written with "may". Ken Wilke, State Board of Agriculture, explained how rules and regulations would apply.

Ms. Rice said she feels the bill gives Amoco the option to sell by single display. The reason for not using "shall" was to give other companies the option to sell differently than Amoco. In her opinion, the secondary display looks too much like something other than gasoline which confuses the public. Amoco would do a double display, but she feels the public will watch the gallon display in the dual display. Also, she disagrees that rules and regs can demand a dual display.

Staff stated that this needs to be spelled out in the legislation.

Mr. Phillips said this might be in conflict with other parts of the weights and measures law. Mr. Wilke explained that it would merely allow the display to be shown, but it does not mandate it as a method of sale. The advantage of dual display is that it would allow the cubic feet flow meters to be checked by weights and measures to insure the correct revenue is collected.

The chairman instructed Ms. Rice and Mr. Phillips to work with staff in finding satisfactory language which would allow Amoco to continue with their compressed natural gas project. Mr. Phillips asked if this could be delayed until after the National Conference on Weights and Measures is held in May. Ms. Rice found this acceptable if a gentleman's agreement is made with Amoco that the dual

CONTINUATION SHEET

MINUTES OF THE SENATE COMMITTEE ON AGRICULTURE

room 423-S, Statehouse, at 10:00 a.m./~~p.m.~~ on March 25, 1992.

display will not be required on July 1. The chairman felt that immediate attention is called for to regulate in such a way to protect the consumer but still allow Amoco to continue to develop its compressed natural gas program.

The chairman turned the committee's attention to HB 3043 concerning cooperative marketing which had been heard yesterday. A written statement from Terry Bertholf had been submitted (Attached to minutes of March 24) and copies distributed to committee members. He asked Ivan Wyatt, who had reviewed the testimony, if he would like to respond. Mr. Wyatt said he still maintains his objections to the bill are correct; it would reduce local control, and a possibility would exist that the coops' ownership could be lost by the farmer owners.

Joe Lieber of the Kansas Cooperative Council briefly explained that the intent of the bill reflects the opinion that coops do not need a special liability law when they are already covered by the same laws as other corporations. With this, the hearing on HB 3043 was concluded.

The minutes of March 24 were approved.

The meeting was adjourned at 11:00 a.m.

MILK

Jackson

ICE CREAM CO., INC.

2600 East Fourth, P.O. Box, 1386, Hutchinson, KS 67504-1386
AC 316/663-1244



ONE OF THE DILLON COMPANIES

March 23, 1992

Dear Senator Montgomery:

Due to a mix up of dates, I was unable to speak in opposition to bill #3046 Dairy Stabilization Fund.

I have enclosed my notes. I hope you will take a few minutes and read them.

Thanks,

JACKSON ICE CREAM CO., INC.

Robert Thiessen
President

RT/1h

Enclosures

Senate Agriculture
3-25-92
Attachment 1

I WOULD LIKE TO THANK YOU FOR GIVING ME THIS OPPORTUNITY TO SPEAK BEFORE YOU TODAY.

FIRST LET ME TELL YOU A LITTLE ABOUT MYSELF. I WAS RAISED ON A DAIRY FARM IN OKLAHOMA NEAR TULSA. I PARTICIPATED IN THE 4-H CLUB AND THE FUTURE FARMERS OF AMERICA WHERE I ACHIEVED THE HONOR OF "JUNIOR MASTER FARMER". I RECIEVED SECOND PLACE IN HE STATE WITH MY DAIRY PROJECT AS A HIGH SCHOOL SENIOR. I OWNED 13 HEAD AND SHOWED THEM AT MOST OF THE FAIRS IN OKLAHOMA AND COMPETED ON THE DAIRY CATTLE JUDGING TEAM. I ENTERED OKLAHOMA STATE UNIVERSITY WHERE I MAJORED IN DAIRY SCIENCE AND BEGAN MY CAREER IN THE DAIRY PROCESSING INDUSTRY WHERE I HAVE BEEN SINCE EXCEPT FOR A 2 YEAR LEAVE.

NOW MY COMPANY. JACKSON ICE CREAM IS LOCATED IN HUTCHINSON WHERE WE PROCESS AND PACKAGE MILK AND MANUFACTURE ALL KINDS OF DAIRY PRODUCTS. WE EMPLOY APPROXIMATELY 150 PEOPLE IN HUTCHINSON. WE ALSO OPERATE AN ICE CREAM PLANT IN DENVER COLORADO AND A MILK PROCESSING PLANT IN PHOENIX ARIZONA. WE PROCESS OVER 600,000 GALLONS OF MILK A WEEK. OUR MILK COSTS IN 1991 WAS OVER \$42,000,000. \$18,000,000 WAS SPENT IN KANSAS ON MILK FROM THE FARM.

AS I REVIEWED THIS PROPOSED BILL, I HAVE MIXED EMOTIONS, BECAUSE I ALONG WITH YOU, AM CONCERNED WITH PLIGHT OF THE DAIRY FARMERS. HOWEVER, I FIND IT VERY DIFFICULT TO SUPPORT A "NEW" TAX DURING THE TIME OF RECESSION THAT WE ARE CURRENTLY IN. MILK, OFTEN CALLED NATURES MOST PERFECT FOOD, NEEDED BY THE YOUTH OF OUR STATE FROM NEWBORNS TO NINETEEN YEAR OLDS AND MANY OTHERS, WILL HAVE ITS PRICE RAISED TO THOSE WHO NEED IT MOST. SOME HAVE SAID THAT THE COST WOULD NOT BE REFLECTED AT

THE STORE. I CAN ASSURE YOU THAT THIS TAX WILL BE ADDED TO THE PRICE OF MILK AS AN INCREASE TO THE CONSUMER. OUR COMPANY CAN NOT AFFORD TO ABSORB A COST INCREASE OF JUST UNDER \$1,000,000.

WE ALSO DO NOT SUPPORT THE IDEA OF OUR STATE DEPT OF AGRI. BECOMING A "BANK" AND MAKING PAYMENTS IF, IT SHOULD BE NECESSARY. WE HAVE BEEN WORKING HARD WITH THE DAIRY COMMISSIONER TO HOLD DOWN THE COST OF THE ADMINISTRATION OF THE ABSOLUTELY NECESSARY REGULATORY DUTIES THAT THEY PERFORM. COLLECTING MONEY OR TRYING TO, FROM THE MANY SELLERS OF DAIRY PRODUCTS TO THE MANY KINDS TO BUSINESSES THAT USE DAIRY PRODUCTS WILL BE A MONUMENTAL TASK TO SAY THE LEAST. THEN TO WRITE CHECKS TWICE A MONTH TO OVER 1200 FARMERS WILL ONLY ADD TO THE PROBLEM. WE HAVE HEARD IN EARLIER TESTIMONY THAT THESE COSTS WILL BE FUNDED FROM THE TAX COLLECTED. WHAT THAT IS TELLING ME IS THAT WE HAVE ALREADY DECIDED TO TAKE A LARGE PORTION OF THESE DOLLARS COLLECTED, FOR THE BENEFIT OF OUR DAIRY FARMERS AND USE IT TO FUND THE PROGRAM. WE ARE DIMINISHING THE VALUE OF THE PROGRAM BEFORE WE EVEN GET STARTED.

THE EFFECT ON OUR RETAILERS LOCATED NEAR OUR STATES' BORDERS IS SOMETHING OF A CONCERN ALSO. IT WOULD TAKE MISSOURI, OKLAHOMA, COLORADO NEBRASKA AND PERHAPS TEXAS TO ENACT SIMILAR LEGISLATION TO OVERCOME THIS DISADVANTAGE. MISSOURI'S BILL HAS BEEN STALLED BY OPPOSITION AND WE DO NOT KNOW WHEN IT WILL BE BROUGHT OUT AGAIN FOR A VOTE.

I AM ALSO CONCERNED WITH THE THOUGHT THAT IF WE ENACT A BILL LIKE THIS WE WILL BE INVITING SOME VERY LARGE DAIRY FARMERS TO ENTER THE STATE WITH HERDS RANGING FROM 500 TO 5000 COWS EACH. IN PHOENIX, WE RECEIVE MILK FROM HERDS OF THIS SIZE. THESE DAIRYMEN EMPLOY FULL TIME VETS AND FULL TIME NUTRITIONISTS TO HELP THEM ACHIEVE FANTASTIC HERD AVERAGES.

ONE I VISITED HAD A ROLLING AVERAGE OF 24,000 LBS PER COW.

IF YOU WILL REFER TO THE GRAPH I HAVE ATTACHED, YOU WILL SEE THAT PAST HISTORY SHOWS THAT MILK PRICING IS CYCLICAL. WE HAVE A PERIOD OF OVER SUPPLY AND THE PRICE OF MILK DROPS. OUR GOVERNMENT INSTITUTES A NEW PROGRAM TO REDUCE SUPPLY, SUCH AS THE WHOLE HERD BUY OUT AND THE DAIRY FARMER REACTS, SOMETIMES WITH THE HELP OF NATURE. I AM REFERRING TO THE DROUGHT OF 1989. WITH THE COMBINATION OF THE WHOLE HERD BUY OUT AND THE DROUGHT, WE SAW MILK PRICES PAID TO FARMERS, ELEVATE TO AN ALL TIME HIGH IN 1990. THE DAIRY FARMER ENJOYED THESE HIGH PRICES AND AGAIN INCREASED THE MILK SUPPLY THROUGH IMPROVED HERD MANAGEMENT AND THE ADDITION OF MILKING COWS. WE THEN ENTERED ANOTHER PERIOD OF OVER SUPPLY, WHICH LOWERED THE PRICE OF MILK AND ON AND ON. LET ME ASSURE YOU HERE TODAY, THAT AN ATTEMPT TO ESTABLISH A FUND TO SUBSIDIZE THE DAIRY FARMER DURING THE DIP IN THIS ON-GOING CYCLE WILL ONLY TEND TO DEPRESS MILK PRICES FURTHER THE SUBSIDY WILL ENCOURAGE MORE PRODUCTION AND WILL PROLONG THE PERIOD OF OVER SUPPLY. PLEASE CONSIDER THAT ALTHOUGH THE GOVERNMENT SUPPORT PRICE HAS DROPPED AS LOW AS \$10.10/cwt, THE PRICE PAID TO THE FARMER HAS ALWAYS BEEN HIGHER. AS YOU MAY HAVE ALREADY HEARD, THE CURRENT PAY PRICE TO KANSAS DAIRY FARMERS IS \$13.00/cwt. DURING THE SAME PERIOD JACKSON MILK AND ICE CREAM COMPANY PAID JUST UNDER \$15.50/cwt. THE PROBLEM WE HAVE TODAY WAS NOT CREATED BY THE DAIRY PROCESSORS OR THE CONSUMERS WHO YOU PROPOSE TO TAX. THE PROBLEM IS WITH OUR OBSOLETE PRICING SYSTEM WHICH WE HAVE LIVED WITH FAR TOO LONG. YOU MAY HAVE HEARD TO THE MINNISCONTO CONCEPT OF MILK PRICING. THAT METHOD IS OBSOLETE AND BADLY IN NEED OF AN OVERHAUL. THERE ARE ALSO SERIOUS PROBLEMS WITH OUR FEDERAL MILK

MARKETING ORDER SYSTEM AND CHANGE IS BADLY NEEDED. THE WHEELS ARE IN MOTION IN WASHINGTON AND THE BEGINNINGS OF CHANGE FOR THIS SYSTEM ARE TAKING PLACE. LET ME ASK YOU TO CONSIDER WHAT I HAVE PRESENTED HERE AND NOT BE TOO HASTY TO PUT A BAND-AID ON THIS SERIOUS PROBLEM WITH HOUSE BILL #3046. INSTEAD, CONSIDER HELPING WITH A PERMANENT FIX BY SUPPORTING THE PROPONENTS WHO ARE WORKING HARD ON REVISION OF OUR OBSOLETE PRICING SYSTEM IN WASHINGTON, D C .

IT HAS BEEN STATED THAT WE HAVE A MILK SHORTAGE IN KANSAS. THERE IS NOT A SHORTAGE OF MILK IN KANSAS. ALL OF THE PLANTS OTHER THAN THOSE DESIGNATED TO BE AVAILABLE FOR THE HANDLING OF SURPLUS MILK ARE GETTING ALL OF THE MILK THEY NEED. IF MILK PRODUCTION IS INCREASED IN THE STATE OF KANSAS IT WOULD GO INTO CLASS III PRODUCTS AT THE CO-OP PLANTS. THIS ADDITIONAL MILK WOULD BE PRICED AT THE CLASS III PRICE, THE LOWEST PRICE IN THE SYSTEM, WHICH WOULD IN TURN LOWER THE BLEND PRICE.

JACKSONS, AS A LARGE MANUFACTURER OF ICE CREAM PRODUCTS, WONDERS WHY THE ITEMS THAT GO INTO ICE CREAM SUCH AS SUGARS, FLAVORS, STABILIZERS, FRUITS, NUTS AND CANDIES SHOULD BE TAXED TO SUPPORT THE DAIRY FARMER.

IT HAS BEEN ASKED RECENTLY IF WE RAISE AND LOWER THE PRICE OF MILK AS THE COST OF RAW MILK CHANGES. OUR ANSWER IS "YES". WHETHER THE RETAILER RAISES OR LOWERS THEIR PRICE IS THEIR BUSINESS. GENERALLY THEY APPEAR TO DO THAT, HOWEVER, WE HAVE NOTICED THAT DURING THE TIME OF EXTREMELY HIGH RAW MILK COSTS, THEY MAY NOT HAVE RAISED IT IN COMPARABLE PROPORTION TO THE COSTS THEY INCURRED AND THEREFORE DID NOT LOWER IT LIKEWISE WHEN THE PRICE FELL.

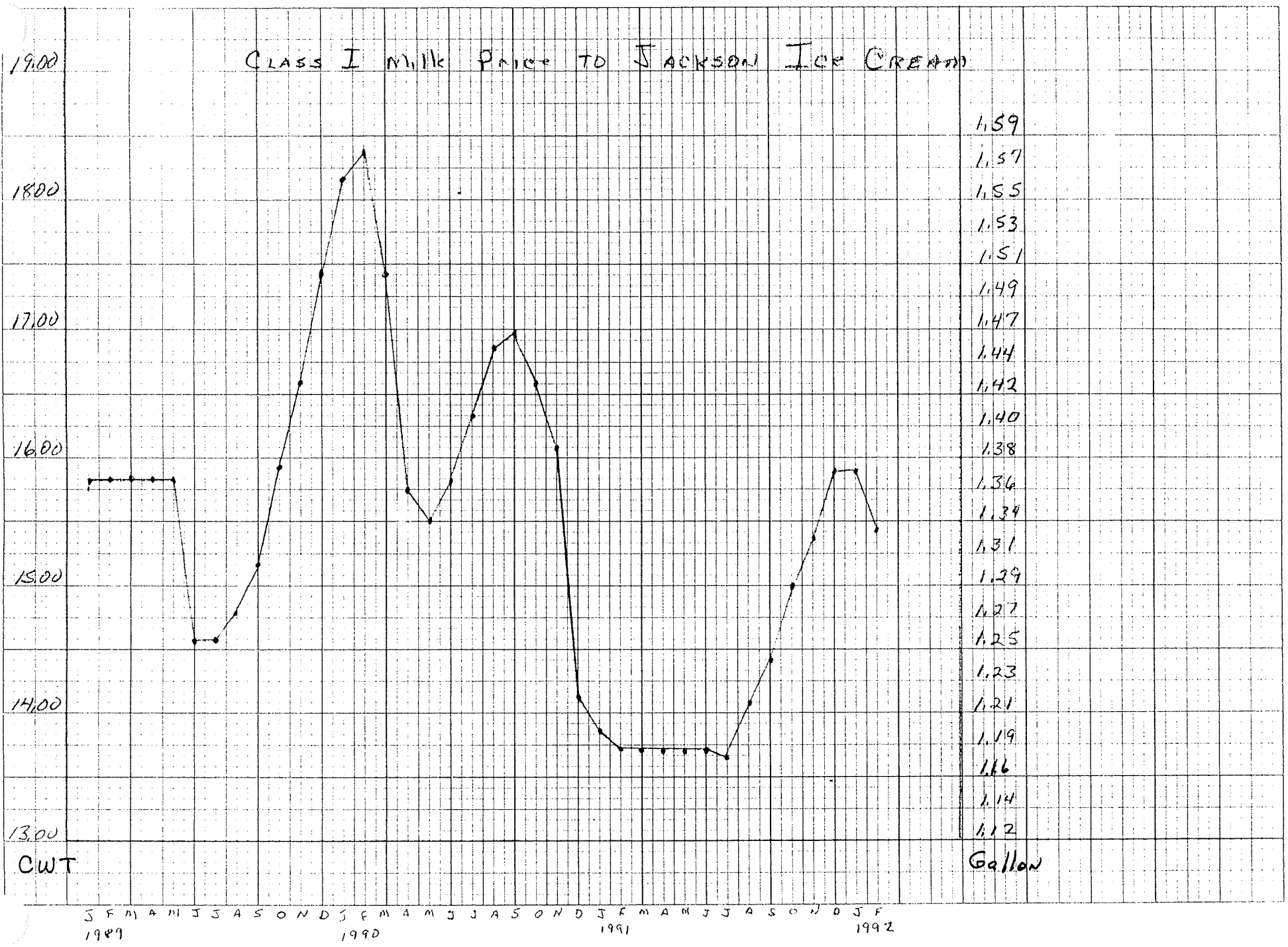
IF YOU HAVE ANY QUESTIONS, I WOULD BE GLAD TO TRY TO ANSWER THEM IF
I CAN. YOU MAY ALSO CALL ME AT WORK. 316 663 1244

THANK YOU

ROBERT THIESSEN
JACKSON ICE CREAM
BOX 1386
HUTCHINSON. KS 67504

A handwritten signature in cursive script that reads "Robert Thiessen". The signature is written in dark ink and is positioned below the typed name and address.

CLASS I MILK PRICE TO JACKSON ICE CREAM



1-7

CWT

Gallon

1989 1990 1991 1992
 J F M A M J J A S O N D J F M A M J J A S O N D J F M A M J J A S O N D J F

1900

CLASS I MILK PRICE TO JACKSON ICE CREAM

1800

1700

1600

1500

1400

1300

CWT

1.59

1.57

1.55

1.53

1.51

1.49

1.47

1.44

1.42

1.40

1.38

1.36

1.34

1.31

1.29

1.27

1.25

1.23

1.21

1.19

1.16

1.14

1.12

Gallon

J F M A M J J A S O N D J F M A M J J A S O N D J F M A M J J A S O N D J F
1989 1990 1991 1992

8-1

TESTIMONY PRESENTED TO THE
SENATE AGRICULTURE COMMITTEE
re: HB 3079

March 25, 1992

by Rebecca Rice, Legislative Counsel
to the Amoco Production Company

Thank you Mr. Chairman and members of the committee. I appear before you today on behalf of Amoco Production Company, who requested that HB 3079 be introduced.

As most of you are aware, Amoco Corporation installed a retail pump for compressed natural gas at 6th and Quincy in Topeka. This is an important development for Kansas as the country moves forward in attempting to utilize alternative cleaner burning fuels.

HB 3079 as amended will allow compressed natural gas to be dispensed at retail in units of "gallon equivalent". A gallon equivalent as defined by the bill is that unit of compressed natural gas which contains 120 cubic feet. The purpose of measuring the gallon equivalent in this manner is to remain consistent with the Department of Revenue's determination of a gallon equivalent for tax purposes.

The sale of compressed natural gas as a motor fuel is not presently addressed in Kansas statute. As addressed by SB 675 and SB 676, which this committee previously adopted, the Division of Weights and Measures would require compressed natural gas to be sold by weight or volume, measurements not understood by the motoring public.

It is Amoco's experience in retailing natural gas, in other locations throughout the United States, that the public is resistant to purchasing motor fuel at retail in any unit other than "gallons". By dispensing compressed natural gas in "gallon equivalents", the motoring public can compare price, miles per gallon, and other variables which the public deems useful in determining which motor fuel, gasoline or compressed natural gas, they wish to purchase.

Without a comparable measure such as the "gallon equivalent", the public appears reluctant to purchase compressed natural gas as an alternative fuel due to other measurements being confusing. It is true compressed natural gas can not be "poured" into a glass gallon container, which is why the pump specifies "gallon equivalent". Cubic feet can be measured. By defining a "gallon equivalent" as 120 cubic feet, weights and measures can test our micro-motion meter which does adjust for temperature and pressure variations to ensure the public gets exactly what the law requires.

We would appreciate this committee's support in assisting Amoco in this original and progressive endeavor. Passage of this legislation will assist Amoco in attempting to present compressed natural gas as a viable alternative fuel.

Thank you, Mr. Chairman.

Senate Agriculture
3-25-92
Attachment 2

SENATE AGRICULTURE COMMITTEE

HOUSE BILL 3079

March 25, 1992

Good morning Mr. Chairman, Members of the Committee. My name is DeVern H. Phillips. I am the State Sealer and as such am responsible for enforcement of the Weights and Measures laws for the Division of Inspections of the Kansas State Board of Agriculture.

What House Bill 3079 proposes is a special method of sale for Compressed Natural Gas (CNG). Marketers of this product are attempting to compete with other products whose use is similar, but the fuels themselves have different characteristics. Natural gas is a vapor. Unless the product is refrigerated to -260° F (with higher pressures) it remains a vapor and must be handled and measured by weight or by cubic feet. Gasoline is a liquid. It can be tested volumetrically and by weight. Our regulatory staff can check liquid products, such as milk, gasoline and other fluids to assure accurate delivery of the quantities shown on the label.

Currently, we are temporarily permitting AMOCO to sell CNG by a displayed "equivalent gallon" based upon 120 cubic feet. The Department of Revenue's equivalent gallon was established in K.A.R. 92-14-9 for TAX purposes only, not as a unit of measurement. Weights and Measures is permitting this method of sale only until July 1, 1992. After this date, a dual declaration of the delivery as measured must appear first and an "equivalent gallon" may appear second.

House Bill 3079 requests the establishment of an "equivalent gallon" defined as a minimum delivery of 120 cubic feet of natural gas. (This would create two methods of sale for the same product: cubic feet for home use; "equivalent gallons" for automobile

*Senate Agriculture
3-25-92
Attachment 3*

usage.) The equipment installed by AMOCO does not measure nor display cubic feet delivered. The equipment utilized in their dispensing device electronically weighs the mass or "weight" of the product. A mathematical factor is fed into a micro processor which then converts this weight into cubic feet. This conversion to cubic feet is then converted mathematically to "equivalent gallons" and displayed on the dispenser as a "gallon".

The "gallon equivalency" displayed is the result of several separate mathematical conversions, none of which are displayed to the consumer. None of these activities are permitted by the United States Department of Commerce as noted in Handbook 44 which is adopted by reference in K.A.R. 99-25-1 pursuant to K.S.A. 83-207. The pertinent provision of the Handbook states that when dispensing natural gas "a device shall indicate, ...its deliveries in terms of cubic feet or cubic meters or multiple or decimal subdivisions of these units".

When a housewife buys a gallon of milk, or a Kansas farmer sells his grain crop - in fact, in all present day commercial transactions - there is an implied faith that as goods are exchanged for money there is the same, just, balance for buyer and seller. In the early days of this country, great variations existed in the weights and measures used in different localities and even, at times, in those used by different individuals in the same locality. The transition from this chaotic marketplace to the present uniformity of weights and measures has resulted from the establishment of accurate, reliable national standards of length and mass and the enactment of comprehensive Weights and Measures statutes.

The United States Department of Commerce has established that there are only two methods of accurately measuring vapors, such as Compressed Natural Gas. These methods are: by the cubic foot or by weight. These methods of measurement and delivery can readily be monitored by regulatory activity so equipped. As an example of such regulatory activity, natural gas, as sold for home use, is metered and sold by the cubic foot and is regulated by the Kansas Corporation Commission.

Regionally, different values for CNG "equivalent gallons" exist and the standardization as required for fair and equitable trade throughout the United States is being ignored. In North Dakota, an equivalent gallon is 120 cubic feet; in Dallas, Texas, it is 124.7 cubic feet; in Minnesota, it is 125 cubic feet.

The problem of non-standardized methods of sale of CNG by "equivalent gallons" is currently being addressed by the United States Department of Commerce and will be discussed in July at the 1992 National Conference on Weights and Measures. To best establish and maintain standardized methods of sale, the States, in concert with industry and the United States Department of Commerce should, working together, establish a standard "equivalent gallon". Once this is done, appropriate regulations can be implemented to address the problem.

We have cooperated with the Kansas Corporation Commission, the Department of Administration and AMOCO since they announced the installation of a CNG dispenser in Topeka. From the beginning, we have explained the Kansas Weights and Measures laws, and stressed that the product can only be sold by cubic feet or by weight. Both of these methods of sale readily permit accuracy testing of the dispensing device by Weights and Measures officials, to assure the consumer they are receiving that for which they have paid.

We appreciate the attempt to improve customer acceptance of an alternative fuel, through "equivalent gallon" comparisons. But, if the dispensing device owner/operator wishes to provide an "equivalent gallonage" driveability comparison between gasoline and CNG, the dispensing device must show the units in which it is measuring, cubic feet or mass. We will accept a secondary display showing "equivalent gallons". Or, if the cost of this modification of equipment for a secondary electronic display is a consideration, a simple display on the top of the pump (see attachment) will provide the consumer with a gallonage equivalency information.

The primary responsibility of State and local weights and measures officials is to prevent fraud and to maintain equity and fair trade practices in the marketplace. Consumers and businesses depend on State and local weights and measures officials to check devices and packages to prevent problems, deceptive sales practices and potential violations.

If CNG is to be sold for motor fuel, it should be displayed at the dispenser in a manner approved by the United States Department of Commerce and in the manner it is being measured and can be tested. Such methods are by cubic feet or by weight.

The method of sale in House Bill 3079 permits the display of a calculated, unmeasured unit to be used for the sale of a product. Our Weights and Measures program cannot monitor the accuracy of the dispensers using the method of sale proposed for CNG in House Bill 3079.

I will stand for questions at this time.

120	Cubic Feet	=	1	Equivalent Gallon
240	Cubic Feet	=	2	Equivalent Gallons
360	Cubic Feet	=	3	Equivalent Gallons
480	Cubic Feet	=	4	Equivalent Gallons
600	Cubic Feet	=	5	Equivalent Gallons
720	Cubic Feet	=	6	Equivalent Gallons
840	Cubic Feet	=	7	Equivalent Gallons
960	Cubic Feet	=	8	Equivalent Gallons
1080	Cubic Feet	=	9	Equivalent Gallons
1200	Cubic Feet	=	10	Equivalent Gallons
1320	Cubic Feet	=	11	Equivalent Gallons
1440	Cubic Feet	=	12	Equivalent Gallons
1560	Cubic Feet	=	13	Equivalent Gallons
1680	Cubic Feet	=	14	Equivalent Gallons
1800	Cubic Feet	=	15	Equivalent Gallons
1920	Cubic Feet	=	16	Equivalent Gallons
2040	Cubic Feet	=	17	Equivalent Gallons
2160	Cubic Feet	=	18	Equivalent Gallons
2280	Cubic Feet	=	19	Equivalent Gallons
2400	Cubic Feet	=	20	Equivalent Gallons