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We are pleased that the Climate Action Reserve has recognized the environmental benefits of ventilation air methane (VAM) oxidation projects and the high quality of the carbon credits that their implementation can create. As we have noted in past discussions, however, often underground coal mine ventilation systems do not vent methane at concentrations high enough to support economically viable projects (i.e., to destroy vented methane in volumes high enough to provide a reasonable cash flow from the sale of carbon credits). Because of the large airflows involved, however, such systems nevertheless do release very large volumes of methane to the atmosphere over time. In fact, ventilation systems constitute the largest source of methane emissions from gassy underground coal mines. To enable VAM destruction project development in such low-concentration circumstances, supplemental methane is needed to raise the effective VAM concentration and thereby increase the carbon revenues that a project can generate. The fact that CAR has determined that drained methane from various in-mine sources does qualify under the coal mine methane protocol means that in many cases VAM projects that on their own would not be economically viable can be made so by blending qualifying drained methane into the mine's ventilation exhaust flow. That is a very positive outcome that should considerably increase the number of potentially viable projects that can be developed and thereby increase the level of methane mitigation that the protocol can achieve in the U.S. However, we are concerned that the protocol leaves one subset of VAM project opportunities stranded: those with low VAM concentrations that only have access to drained methane from abandoned mines. The protocol's climate change mitigation potential clearly could be increased substantively if it were to enable the largest number of VAM projects to be developed. We therefore request that CAR reconsider qualifying abandoned mine methane, at least when it is used to supplement VAM flows that by themselves are too low in concentration to support economically viable methane destruction projects.