



October 23, 2008

Dear Sir/Madam:

On behalf of Blue Source, LLC, I would like to thank the CCAR staff for revising the Landfill Project Reporting Protocol and appreciate the opportunity to comment on the revised protocol. The inclusion of open flares as approved combustion devices and the many changes to project eligibility criteria are excellent improvements. Our specific comment relates to the need for separate monitoring for new flare systems.

Section 3.3.1 Item 2c on pg. 7, states

"The new GHG project must be designed to be entirely separate from the existing collection system and must be monitored separately from the existing system. The new landfill gas collection system can use the existing destruction device, as long as the project landfill gas is metered separately and the total quantity of landfill gas sent to the destruction device is within the acceptable limits of the manufacture specifications."

We request that the above condition be modified to exclude landfills that are equipped with passive flares from requiring separate monitoring between new and existing gas collection systems.

In the case of passive flares, the methane recovery rates from the existing passive flare system can be measured prior to the implementation of the new system and subtracted from the total methane measurements made after the new wells become operational, to establish the baseline. The new project could use the existing infrastructure to connect with the new wells. In these projects both existing and new wells operate in the same landfill area, and it is not possible to operate and monitor separate systems as prescribed by the above requirement. The methane volumes collected from passive wells are small and this approach can be adopted for passive systems without loss in accuracy.

Sincerely,

Mahesh Gundappa
VP- Engineering