

## **USEPA Comments on CAR CMM Protocol Version 2.0**

**March 2012**

Our comments are as follows:

1. 3.5 Regulatory Compliance: It is unclear how a verifier would determine mine (or project developer) violations of any and all federal and state regulations. For a mine, regulatory agencies could include MSHA, USEPA, state safety and environmental agencies, etc. Once all violations were found, the verifier would then have to determine the severity of the violation. This does not seem like a reasonable requirement, given that a mine may have hundreds of MSHA violations alone in any given year.
2. Coal Mine Gas: the definition of CMG is given in 5 pg. 24 but the term is used a number of times earlier in the protocol.
3. 6.2 page 41: the third paragraph refers to "... the penalties above". However, the calibrations or adjustments in items 1 and 2 "above" this reference are not labeled as penalties.