

Coal Mine Methane Project Protocol Version 2.0 Public Comment Webinar



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March 13, 2012

Webinar will begin shortly

For audio, please dial: (646) 307-1715

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Agenda

- Presentation of changes from V1.0 to V2.0
- Public comment on proposed changes
- Next steps



Why a Version 2.0?

- Expand scope of regulatory compliance
- Reflect streamlined monitoring requirements adopted in other protocols
- Respond to user feedback and requests for clarification
 - Monitoring and QA/QC requirements
 - Improve clarity of protocol language
- Incorporate policy memos issued since 2009



Drainage Project Definition (2.2.1)

- Added flexibility for how a project developer defines a drainage project (new project vs. project expansion)
 - New project = new start date and crediting period; separate verification
 - Project expansion = existing project start date and crediting period; same verification



Pipeline Project Eligibility Update

- Version 2.0 does not include performance standard for pipeline projects
- Decision in August 2011 that existing data is too limited to support performance standard development
- New data expected from EPA Greenhouse Gas Reporting Program in December 2012
- May conduct additional analyses at that time
- Memo and resources from workgroup process available on [Coal Mine Methane Project Protocol Development](#) webpage



Eligibility Rules

- Added deadline for applying for a second crediting period (3.3)
- New section on US EPA GHG permitting requirements (3.4.1.1)
 - Effective, January 2011, EPA issued Tailoring Rule making GHGs subject to New Source Review Program under CAA
 - New mines or mines with major modifications could be affected
 - If a mine triggers a PSD permit and BACT review legally requires installation of CMM/VAM destruction technology, related emission reductions not eligible as of required installation date



Regulatory Compliance (3.5)

- Expanded scope of regulatory compliance requirement to the mine where the project is located
- All instances of non-compliance at the mine must be disclosed to verifier
- Recurrent, negligent or intentional non-compliance will result in no CRTs issued for GHG reductions during the period of non-compliance
- Non-compliance due to acts of nature, administrative or reporting issues will not affect CRT crediting
- Attestation of Regulatory Compliance would be changed accordingly



Section 4 and Section 5

GHG Assessment Boundary (Section 4)

- Separate figures for drainage and VAM projects
- Revised SSRs and descriptions

Quantifying GHG Emission Reductions (Section 5)

- Changed NMHC threshold requirement from a volume requirement to a mass requirement
 - 35,000 mg/m³ for CMG
 - 3,500 mg/m³ for ventilation air
- Updated Equation 5.10 to respect ideal gas law



Project Monitoring

- Project diagram to include placement of monitoring equipment – part of Monitoring Plan instead of submittal documents
- Improved guidance on VAM project monitoring to reflect changes in Equation 5.10 (6.1)
- Expanded eligibility of labs for NMHC testing to include AIHA, A2LA and NELAP (6.1)
- Guidance to allow a single meter to monitor multiple destruction devices (6.1.1)



Instrument QA/QC (6.2)

- Replaced quarterly equipment cleaning and inspection requirements with manufacturer's recommendations
- Added flexibility to use field check two months after end of reporting period to confirm calibration accuracy during crediting period
- Replaced minimum off-site equipment calibration requirement with manufacturer's recommendation
 - Removed requirement for calibration every 5 years
- Clarified required accuracy of monitoring equipment



Policy Memos

Use of eGRID Electricity Emission Factors (May 3, 2011)

- Removed eGRID emission factor table from appendices
- Use version of eGRID from EPA website that most closely corresponds to time period electricity was consumed

Project Diagram Required at Verification (February 13, 2012)

- Project diagram no longer required at submittal
- Part of Monitoring Plan and includes placement of metering/monitoring equipment



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Public comments



Regulatory Compliance

- Reserve is requesting feedback on proposed change – consider:
 - Ability of verifier to assess negligence, intent, etc.
 - Severity of violation
 - Access to documentation on citations/orders beyond MSHA Mine Data Retrieval System
 - Timing of citations and resolution by MSHA



Next Steps

- Submit written comments via Coal Mine Methane Revision webpage - deadline is **5 PM PDT on Friday, March 30**
- Reserve staff will report to Board re: public comments received on June 27
 - Opportunity for additional public comment in person or by telephone
- Additional informal stakeholder consultation over the summer
- Protocol scheduled to be considered by Board on September 26
- Response to comments and revised protocol will be available in early September

Questions and Feedback



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