



**Climate Action Reserve**  
**Update on Coal Mine Methane Project Protocol, Version 2.0**  
August 10, 2011

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Since May 2009, Reserve staff has been working with the coal mine methane (CMM) multi-stakeholder workgroup to develop a performance standard approach that would define eligibility for CMM drainage projects that send gas to pipeline (“pipeline projects”). This project type was excluded from Version 1.0 of the protocol because data analyzed at that time did not support establishing a performance standard for such projects.

Reserve staff has since developed two distinct performance standard approaches based on new datasets gathered directly from coal mine operators and owners; neither approach garnered the support of the workgroup. The Reserve has concluded that the data available, even with the addition of the new data collected since May 2009, do not support further analysis for additional performance standard proposals for pipeline projects.

New data is expected to become available from the U.S. Environmental Protection Agency Greenhouse Gas Reporting Program (GHGRP) in December 2012. Under Subpart FF of the GHGRP, underground coal mines are required to report data that should be appropriate for additional analyses. This includes weekly flow rates and concentration of CH<sub>4</sub> liberated from each degasification system at each well (or each centralized monitoring point), and whether the CH<sub>4</sub> is vented or collected.<sup>1</sup> One major shortcoming of data collection efforts to date was that while some mines were able to provide CH<sub>4</sub> concentration at the well level, they were not able to provide flow rates. Since the Reserve believes gas volume plays a pivotal role in the decision to send gas to pipeline, flow rates are a critical part of the analysis.

When the GHGRP data become available, the Reserve may conduct additional analyses to continue efforts to develop a performance standard for pipeline projects. In the meantime, the Reserve does plan to release a Version 1.1 of the CMM Project Protocol to incorporate technical revisions based on the protocol’s use over the last 2 years.

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<sup>1</sup> <http://www.epa.gov/climatechange/emissions/downloads/infosheets/UndergroundCoalMines.pdf>