

To: Voluntary Carbon Standard Association (secretariat@v-c-s.org)

From: Verdeo Group, Inc.

Date: July 14, 2010

Re: Stakeholder Comments on “Methodology for interception, recovery and use of methane from CBM Seeps that would otherwise be vented to the atmosphere”

Thank you for the opportunity to provide comments on the proposed methodology “Methodology for interception, recovery and use of methane from CBM Seeps that would otherwise be vented to the atmosphere” submitted to the Voluntary Carbon Standard (VCS) Association by Southern Ute Alternative Energy. This proposed methodology will be a valuable addition to the suite of methodologies available for use in the international and U.S. carbon markets under the VCS.

Our comments on and recommendations to this proposed new methodology are directed to the following issues outlined below.

1. Page 1 – Provide more bibliographical information on the tools (e.g., “CDM”) so that they may be readily located.
2. Page 2 – Add “monitoring wells” to the definition section so that the use of the term is understood throughout the methodology.
3. Page 3 – Clarify if it is permissible to extract residual water from eligible wells if the process is not intended to enhance methane recovery.
4. Page 3 – Allow emissions from fuel consumption from the transport of fuel to be considered on a case-by-case basis for inclusion in the Project Boundary. These should be excluded for simplification in cases where they are insignificant.
5. Page 5 – Clarify language in the cell “Baseline, Grid electricity generation (electricity provided to grid)”, Justification/Explanation.
6. Page 8 – In Figure 2, clarify if methane extracted through “PRODUCING WELL” would be included in the project boundary. Indicate if this is a CBM well (as it extends beyond the ground water level)

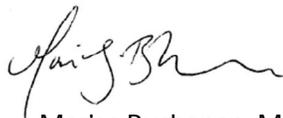
and whether it is eligible or ineligible. Perhaps provide a visual example of an eligible and ineligible well to provide clarity on what type of extraction well is eligible under the methodology.

7. Page 8 – Provide further guidance on the spatial extent of eligible wells (e.g., distance to coal outcroppings or other factors that should be used to define eligibility).
8. Page 9 – Clarify the term “annually-averaged baseline emission rate” and application of this value.
9. Page 21 – State that the use of U.S. EPA eGRID carbon emissions factors are acceptable for projects that are developed in the U.S.; eGRID is the primary source of air emissions data for the electric power sector and is used by the EPA, federal government agencies, and states.
10. Global – Confirm the units of density used throughout the methodology (kg/Nm^3)

Thank you for the opportunity to submit these comments in response to the proposed new methodology. For further questions, please contact:



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