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From: Peet Soot [peet@cmmenergy.com]
Sent: Friday, August 14, 2009 7:15 AM
To: secretariat@v-c-s.org
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Follow Up Flag: Follow up
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Ladies and Gentlemen,

I have briefly read with interest the revisions proposed to ACM0008 that would allow for inclusion of abandoned mines. This is definitely on the right track as there is no good reason why AMM is not considered under this protocol. However, the revisions do not reflect a good understanding of abandoned mines and the production of methane from such sites. If these proposed modifications were not corrected to reflect the true nature of AMM, it will do the industry a disservice.

A significant shortcoming for the hyperbolic decline curve is the implication that a given mine is a single reservoir. This type of formula may be suitable for national surveys of possible emissions from abandoned mines, but it is hardly representative of any single mine - and that is the task at hand. I have personally been involved with production of methane from AMM for decades and have experienced cases where there are numerous individual reservoirs that are not interconnected underground. They behave as totally isolated reservoirs. There is no way of knowing how many reservoirs there might be. The idea that a single decline curve (with the starting point at a production level associated with the mine at time of closure) can address this issue is somewhat naive.

The other problem with the hyperbolic decline is that I have experienced mines that have not had significant declines in total methane production for years. They have been continually recharged at a rate sufficient to keep the production level relatively constant.

Knowing the variability of methane emissions from any given mine, what value would be used for the emissions at time of closure, the average from the last day, or the last year, or some other statistically generated average value? Any of these values would be subject to disagreement.

There are other problems as well, including the inference that a mine is either flooded or not. Again from personal experience, partially flooded mines are very good sources of AMM. And, would an operator be allowed to dewater the mine in order to enhance production? It would seem that should be specifically precluded. There is no more opportunity for the methane to reach the surface from any part of the mine that is flooded. Removing the water artificially would simply create emissions that would not have normally occurred. Allowing carbon emission credits from capture of such methane should not be allowed.

There are issues of the reservoir pressure during production that would also affect the suitability of this protocol. Would the producer be allowed to pull a vacuum on the reservoir? That might allow for overproduction of the reservoir and create questions as to the vintage of any production from such a system.

The more I read the draft, the more questions arose in my mind.

The conclusion is that this well-intentioned effort needs close scrutiny before it is "etched in stone".

Unfortunately, I do not have the resources that would allow me to donate any more of my time to properly address all the shortcomings of these proposed changes. This would take many days of review and proposed editing. Hopefully you will get enough inputs from others to correct the shortcomings of this protocol so it can be properly vetted. Otherwise, I would ask that you find some way of getting more inputs prior to approving this modified protocol.

I hope you still consider these comments even though they may reach you a day late as I have been out of the country for a week and just realized the deadline for this matter,

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