

**Eighth Session**

Geneva, 29 April 2013

Item 11 of the provisional agenda:

**Establishing an International Centre of Excellence  
on Coal Mine Methane**

**UNFCCC response to comments on the revision of methodology  
ACM0008 made by the Ad Hoc Group of Experts on Coal Mine Methane**

*Update received on 15 January 2013*

The Methodological Panel (MP) at its [fifty-eighth](#) meeting agreed to revise CDM methodology ACM0008 "Consolidated methodology for coal bed methane, coal mine methane and ventilation air methane capture and use for power (electrical or motive) and heat and/or destruction through flaring or flameless oxidation" to simplify the baseline emissions calculation and (to) improve clarity. In addition, the possible expansion of the applicability to methane capture from abandoned mines was considered.

As a first step, the comments prepared by the UNECE group of experts on coal mine methane

([www.unece.org/fileadmin/DAM/energy/se/pdfs/cmm/pub/ACM0008\\_GE\\_comment.pdf](http://www.unece.org/fileadmin/DAM/energy/se/pdfs/cmm/pub/ACM0008_GE_comment.pdf)) were discussed and analysed. While some comments were found relevant, some other could not be implemented on the methodology level or may require further clarification.

Here is the complete list of comments, with a short summary of discussion and analysis:

1. Widen applicability of drainage from the surface using CBM wells to reduce outburst risk

The current version of the methodology allows retroactive claiming of eligible CBM from the time when mining activity entered the zone of influence of a particular well. Further clarification on this comment is needed to explain how it is proposed to expand applicability.

2. Ensure that ACM0008 is not applied to encourage unsafe mining practices

Although the example provided could take place under certain conditions, the methodology itself cannot apply any penalties to prevent such cases. The Executive Board could be approached directly so that it can discuss this issue.

3. Abandoned mine methane (AMM)

Current version of the methodology does not apply to capturing methane from abandoned/decommissioned mines because of the idea that properly decommissioned mine should not emit any methane. Further clarification on this comment is needed to explain how it could be demonstrated that the same amount of methane would have been emitted from an abandoned/decommissioned mine in the absence of the CDM. References to national regulations for abandoned/decommissioned mines also would help.

4. Refine the conditions for crediting to encourage open-pit mine pre-drainage

Elaboration is needed on retrospective crediting for wells abandoned due to air contamination arising from infiltration of air across the face.

5. Remove the excessive gas venting ACM0008 requires where there is an existing thermal use included in the baseline

The section on baseline emissions from methane destruction in the baseline scenario is going to be revised, so this issue will be addressed.

6. Designing PDDs to match the real world - allowing for changes in project activity

Although the proposed concept may be valuable in some cases it cannot be introduced on the methodology level. The Executive Board should be approached directly so that it can discuss this issue.

7. Simplifying the methodology by clearly identifying relevant parameters

Comment is valid and will be addressed.

8. Error in the methodology for calculating VAM emission reductions (p19)

Comment is valid and will be addressed.

9. Benchmarks for captive power and power exported to the grid in investment analysis

Comment is valid and will be addressed.

According to UNFCCC procedures, revision of a methodology undergoes some stages including consultation with stakeholders. The draft revised ACM0008 will be available to the UNECE group of experts before being recommended for approval by the Executive Board.

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