

VERIFICATION REPORT FOR THE COAL MINE METHANE CAPTURE AND USE PROJECT AT THE NORTH ANTELOPE ROCHELLE COAL MINE COMPLEX



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Summary:

This report is provided to Blue Source as a deliverable of the Verified Carbon Standard (VCS) project verification process for the Coal Mine Methane Capture and Use Project at the North Antelope Rochelle Coal Mine Complex Project (the Project). The Project consists of the collection and utilization of fugitive methane emissions from the North Antelope Rochelle coal mine near Gillette, Wyoming; methane gas collected is injected into a natural gas distribution pipeline.

The verification process and scope consists of the independent third-party assessment of the implementation of the Project and emission reduction assertion against the criteria stated in the Verified Carbon Standard (VCS) Standard, 25 March 2015, v3.5; the approved Clean Development Mechanism (CDM) Methodology ACM0008 (Version 5); the VCS Methodology Revision VRM0001 (Version 1.0) and the validated Project Description (VCS PD), March 30, 2009. The scope of this verification was compromised of monitored data from six wells that was not included in a prior verification for the Project. The purpose of the verification is to ensure the Project was implemented and monitored in accordance with the VCS PD and underlying methodology.

During the verification process, First Environment, Inc. (First Environment) issued eight corrective action requests and two clarification requests, all of which were addressed sufficiently. No uncertainties were identified during the verification process. The Project claims emission reductions of 193,750 metric tonnes CO₂e for the period of March 28, 2006 through October 31, 2007. First Environment, Inc. is reasonably assured that the Project meets all relevant VCS program requirements and correctly applies the CDM Methodology ACM0008 (Version 5), the VCS Methodology Revision VRM0001 (Version 1.0), and the VCS PD.

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1 INTRODUCTION

This report is provided to Blue Source as a deliverable of the Verified Carbon Standard (VCS) project verification process for the Coal Mine Methane Capture and Use Project at the North Antelope Rochelle Coal Mine Complex Project (the Project) located near Gillette, Wyoming. This report covers the verification of greenhouse gas (GHG) emission reductions from the capture and destruction of coal mine methane over the period from March 28, 2006 through October 31, 2007. First Environment, Inc. (First Environment) conducted the verification from the date of the kick-off meeting through July 27, 2015.

In 2009, the Project previously reported, and First Environment verified, emission reductions for the March 28, 2006 through October 31, 2007 period. This verification covers data for mine methane collected from six additional wells that were not included in the previous verification (see Table 1 below). VCS issued a formal exemption from the requirements in the VCS Standard to Blue Source in order to allow the reporting of additional emission reductions from a monitoring period that was previously verified.

Table 1: Wells include in verification scope

Well ID
21-2
12-25
23-25
34-25
43-25
VEG 22-30

During the verification process, Blue Source LLC (Blue Source) acted as the project advisor for the project proponent, Peabody Natural Gas, LLC (PNG). As such, First Environment communicated directly with Blue Source regarding all verification activities.

1.1 Objective

The purpose of this verification was, through review of appropriate evidence, to establish that the Project conforms to the requirements of the verification criteria discussed in Section 1.2.

1.2 Scope and Criteria

The specific scope metrics for the verification are outlined in the table below:

Reporting Period	March 28, 2006 – October 31, 2007
Emission Sources Verified	<i>Baseline Sources</i> - Fugitive emissions of CH₄ from mine operations <i>Project Sources</i> - Emissions of CO₂ from purchased electricity - Emissions of CO₂ from coal mine methane destruction in the gas grid and by project equipment - Emissions of CH₄ from uncombusted methane
Definition of Materiality	- Misstatements of greater than five percent of the Project's GHG assertion; and - Qualitative non-conformities with the Standards of Verification described below

The following table outlines the guidance and protocols used to conduct this verification:

Standards of	VCS Standard: VCS Version 3, 25 March 2015, v3.5 (VCS)
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Verification	Standard) • Approved Clean Development Mechanism (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 and flameless oxidation" Version 5 • Revisions to ACM0008 to Include Pre-drainage of Methane from an Active Open Cast Mine as a Methane Emission Reduction Activity, v1.0, VMR0001 • Validated VCS Project Description (VCS PD) dated March 30, 2009
Verification Process	• VCS Standard • VCS Program Guide: VCS Version 3, 8 October 2013, v3.5 • ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions, 2006

The Monitoring Report dated August 17, 2015 and titled "Coal Mine Methane Capture and Use Project at North Antelope Rochelle Coal Mine Complex" Version 6.0 was also used to inform the verification assessment.

1.3 Level of Assurance

First Environment and Blue Source have agreed that a reasonable level of assurance be applied for the Project.

1.4 Summary Description of the Project

The Project consists of the collection and pipeline injection of fugitive methane emissions from the North Antelope Rochelle Coal Mine Complex (NARM Complex) located near Gillette, Wyoming. The captured coal mine methane is injected into a natural gas transmission pipeline. The Project claims GHG emission reductions from the destruction of the coal mine methane in a natural gas pipeline which would otherwise have been released to the atmosphere. The VCS PD provides additional details regarding the site and the gas collection and injection systems.

2 VERIFICATION PROCESS

The verification process was utilized to gain an understanding of the Project's GHG emission sources and reductions and to evaluate and verify the collection and handling of data, the calculations that lead to the results, and the means for reporting the associated data and results.

The following verification process was used:

- conflict of interest review;
- selection of Audit Team;
- kick-off meeting with Blue Source;
- review of the VCS PD;
- development of the verification plan and sampling plan;
- desktop review and evaluation of raw data, calculations, and supporting documentation for the period under review;
- follow-up interaction with Blue Source for corrective action, clarification, and supplemental data as needed; and

- final statement and report development.

2.1 Method and Criteria

The following verification method was applied when conducting the verification:

Conflict of Interest Review

Prior to beginning any verification project, First Environment conducts an evaluation to identify any potential conflicts of interest associated with the project. No potential conflicts were found for this project.

Audit Team

First Environment's Audit Team consisted of the following individuals who were selected based on their verification experience, as well as familiarity with coal mine methane operations:

Michael Carim – Lead Verifier
 Jeff Daley – Verifier
 Howard Kanter - Verifier
 Jay Wintergreen – Internal Reviewer

Audit Kick-off

The verification audit was initiated with a kick-off conference call on April 2, 2015 between First Environment and Blue Source. The communication focused on confirming the verification scope, objectives, criteria, schedule, and the data required for the verification.

Project Description Review

The Audit Team reviewed the VCS PD as a basis for developing the verification plan.

Development of the Verification Plan

The Audit Team formally documented its verification plan as well as determined the data-sampling plan. The verification plan was developed based on a discussion of key elements of the verification process during the kick-off meeting. Blue Source was afforded the opportunity to comment on key elements of the plan for verification. Based on items discussed and agreed upon with Blue Source, the plan identified the First Environment team members, project level of assurance, materiality threshold, and standards of evaluation and reporting for the verification. It also provided an outline of the verification process and established project deliverables. A separate sampling plan was designed to review all project elements in areas of high risk of inaccuracy or non-conformance.

Site Visit

First Environment performed a site visit on October 23, 2007 as part of the previous verification process for the Project. The site visit included interviews with relevant site personnel and project stakeholders; review of the Project's operations, data collection procedures, and information management systems; as well as assessments of the Project's controls for sources of potential errors and omissions. The mining operations have ceased and all wells have been abandoned; additionally all gas-flow data relevant to the current reporting period was collected in 2007 and earlier. Therefore, no data collection or monitoring is occurring and all relevant wells to this reporting period had been shut-in back in 2007. For these reasons, a subsequent site visit for this verification period was deemed unnecessary.

Desktop Review

The Audit Team performed a desktop review of the Monitoring Report, GHG emission reduction assertion, and supporting documentation, as further described in Section 2.2 below.

Corrective Actions and Supplemental Information

The Audit Team issued requests for supplemental information, corrective action, and clarification during the verification process. The corrective action and clarification requests and the responses provided by Blue Source are summarized in Appendix A.

Verification Reporting

Verification reporting documents the verification process and identifies its findings and results. Verification reporting consists of this report and a separate Deed of Representation to be submitted to the VCS Association.

2.2 Document Review

During the verification process, First Environment reviewed the Project's Monitoring Report, GHG emission reduction assertion, and supporting documentation for the current verification period to ensure consistency with the VCS PD and ACM0008 and VMR0001. Discrepancies between project documentation and the verification criteria were considered material and identified for corrective action. Monitoring deviations required appropriate justification from Blue Source. Additionally, First Environment assessed the GHG emission reduction assertion and underlying monitoring data to determine if either contained material or immaterial misstatements. The results of these reviews are discussed in greater detail below.

2.3 Interviews

Through the course of verification activities, First Environment interviewed the following project personnel to inform the verification process:

Will Overly – Blue Source (Project advisor)

2.4 Site Inspections

As described above, a site visit was not conducted for the current verification reporting period.

2.5 Resolution of Findings

The Audit Team issued eight requests for corrective action and two requests for clarification during the verification process. Blue Source's responses were sufficient to resolve the corrective action request. The corrective action and clarification requests and the responses provided are summarized in Appendix A.

2.5.1 Forward Action Requests

Not applicable – First Environment neither identified existing nor issued new forward action requests.

2.6 Eligibility for Validation Activities

First Environment is accredited to perform validation activities in Sectoral Scopes 8 and 10, which are the applicable scopes for the approved methodologies ACM0008 and VMR0001.

3 VALIDATION FINDINGS

The validation process consisted of an assessment of any deviations or other discrepancies from information presented in the validated VCS PD. The Audit Team reviewed justification for each deviation, including supporting documentation, in order to confirm that it was consistent with the underlying methodology and did not negatively impact the conservativeness or accuracy of the emission reductions.

3.1 Participation under Other GHG Programs

Not applicable – The Project is not registered under another approved GHG programme.

3.2 Methodology Deviations

Not applicable – No new methodology deviations were proposed during the current verification.

3.3 Project Description Deviations

The following project description deviations were identified in the Monitoring Report and approved for the Project during the current verification:

- The VCS PD states that cumulative gas flow will be recorded daily from the site's individual well flow meters, and sales flow meter, which is then entered into an oil & gas software program called "Enertia" that allocates the total gas production back to each individual well. During the current reporting period, the Project uses well flow data sourced from monthly regulatory reports submitted to the Wyoming Oil and Gas Conservation Commission (WOGCC). This data is acceptable because it was reported monthly for regulatory compliance purposes, and in several months during the reporting period, results in a more conservative representation of flow data when compared to the flow data recorded by the Enertia program and reported in sales records. First Environment approved this deviation because the WOGCC data is more conservative than the sales data and therefore results in a more conservative estimate of emission reduction totals.
- The VCS PD states that the sales flow meter will be subject to a regular maintenance regime to ensure accuracy. The sales meter is to be maintained by the buyer of the methane. Because the buyers have changed over time, calibration records dating back through the current reporting period are unavailable. The flow data recorded by the sales meter is considered to be valid and accurate because this meter is a revenue meter and is also used for regulatory reporting purposes. First Environment approved this deviation because the flow meter is considered a revenue meter that was the basis for payments of methane gas. Additionally, the data recorded by the meter was used for regulatory reporting to the WOGCC.
- The VCS PD states that equipment used to monitoring methane concentration in mine gas will be subject to a regular maintenance regime and calibrated as necessary prior to each use. Evidence of calibrations performed during the reporting period was unavailable. First Environment approved this deviation because the data generated by instruments is used to determine payments for methane gas sold and injected into the natural gas pipeline and therefore functions as a revenue meter.
- The VCS PD identifies Blue Source, LLC as the Project Proponent. However, the project proponent is Peabody Natural Gas, LLC as they are the owner of the Project equipment and have overall control and responsibility of Project operations.

The project description deviations described above did not impact the applicability of the methodology, additionality, or the appropriateness of the baseline scenario, and the Project remained in compliance with ACM0008, VMR0001, and VCS requirements. In addition, Blue Source provided appropriate descriptions and justifications for all relevant deviations during the verification process. All project deviations were deemed to be valid.

3.4 Grouped Project

Not applicable – The Project is not a grouped project.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

The Project is implemented according to the description provided in the VCS PD, except where noted below. The Project began commercial operation by injecting pipeline gas on March 1, 2002. The first crediting period began on March 28, 2006 and ends on March 27, 2016. The Project's start date and crediting period were previously confirmed during validation. No data and/or variables presented in the

Monitoring Report differ from those stated in the VCS PD, except where noted in Section 3.2 above as a project description deviation or as described below.

First Environment confirmed during the verification process that GHG emission reduction credits had not been registered under another GHG programme. Additionally, Peabody Energy, the parent company of the Project Proponent, provided an attestation dated July 23, 2015, indicating that no other type of environmental credit is sought for the current verification period.

The following topics were discussed with Project personnel during the previous verification site visit and reconfirmed during the current verification process:

- the data collection process used to generate reports, and
- internal documents and protocols that set guidelines for the data collection process.

The information gathered during these discussions and review was used to assess the Project's data management systems and its controls for sources of potential errors and omissions. The primary aspects of the Project's monitoring plan are described below.

Gas flow data for the entire collection system is measured at the custody transfer point using an ABB Totalflow's X-series flow meter. Additional flow meters are located at each well. Calibration records for all relevant project flow meters are not available. However, as described in Section 3.3 above, monthly regulatory reports submitted to the Wyoming Oil and Gas Conservation Commission (WOGCC) that detail individual well flow data are used as the basis for emission reduction calculations.

On a periodic basis, a Varian Instruments Gas Chromatograph (GC) is used at the PNG sales meter to sample and analyze concentrations of methane and non-methane organic compounds in mine gas extracted. The gas chromatograph is calibrated, as necessary, prior to each use. Calibration records for the gas chromatograph during the reporting period were not available. However, as described in Section 3.3 above, the deviation relative to gas composition instrument QAQC requirements was approved.

As of April 1, 2009, there were no longer any wells in production. Well flow data was collected over the lifetime of each well. Credit for cumulative methane capture is claimed at the time a well is shut-in. Evidence of well shut-in was provided in the form of an official Sundry Notice to the Wyoming Oil and Gas Conservation Commission (WOGCC), which identifies the exact date of well shut-in. Sundry Notices were provided for five of the six wells. A Sundry Notice was not available for the sixth well (VEG22-30). Evidence of well VEG22-30's shut-in was provided in the form of a regulatory report (Form-2) which was submitted to the WOGCC. This report identified the month and year that VEG22-30 was shut-in, which falls within the current reporting period. The dates of well shut-in for the applicable well are identified in Table 2 below:

Table 2: Well shut-in dates

Well ID	Shut-in Date
21-2	October 11, 2007
12-25	October 8, 2007
23-25	October 8, 2007
34-25	October 8, 2007
43-25	October 8, 2007
VEG22-30	June 2006

The following methodology deviations were previously validated for the Project:

- Project electricity consumption was not measured continuously with dedicated project meters as required per ACM0008. Instead, total electricity consumption is conservatively estimated assuming the equipment was operated continuously and under the maximum design horsepower

rating for each piece of equipment. First Environment approved this deviation at validation because the assumption of continuous equipment operation and maximum potential horsepower to estimate electricity consumption results in a conservative estimate of Project electricity consumption.

- Project fossil fuel consumption by fleet vehicles was not measured continuously with a fuel meter, as required per ACM0008, and is instead estimated using vehicle miles driven and known fuel economy for each vehicle. First Environment approved this deviation at validation because the use of actual vehicle miles driven multiplied by vehicle fuel economy provides for an accurate representation of vehicle fleet fuel consumption without impacting the accuracy of the emission reduction calculations.
- Methane quality was not measured hourly and aggregated daily as required per ACM0008. Instead, the methane content of the gas is determined on site at the gas sales point on a periodic basis with a portable gas chromatograph. The gas composition in the coal seam may vary slightly from well to well, however, as identified in the VCS PD the gas concentration testing data from two wells located approximately one mile apart reported similar gas composition values. Additionally, the monitoring of methane content is consistent with the buyers' strict methane concentration requirements. First Environment approved this deviation because the use of periodic methane content measurements at the gas sales point provide an accurate representation of the methane content of the gas that is ultimately destroyed in the pipeline.

The data collection and recordkeeping procedures were found to be consistent with those outlined in the monitoring plan described by the VCS PD and meet the requirements of the ACM0008 and VRM0001.

There were no remaining issues or material discrepancies from the previous validation or verification processes.

The Project has not received or sought another form of environmental credit nor has it become eligible to do so since the validation. First Environment confirmed through an attestation provided by Peabody Energy that registration has not been sought for any other type of environmental credit associated with the Project.

4.2 Accuracy of GHG Emission Reduction and Removal Calculations

Emission reductions are calculated ex-post using the approach indicated in VMR0001, ACM0008, and the validated VCS PD. Emission reduction calculations for the verification period were reviewed to ensure accuracy in the formulas used and the raw data used as inputs. The formulas were tested and found to be consistent with the calculations described in VMR0001, ACM0008, and the validated VCS PD.

Monitored data for methane captured and injected in the pipeline ($CBM_{ei,y}$), multiplied by the respective monitored methane concentration (PC_{CH_4}), is used to determine the total methane destroyed by the project activity (MM_{PL}). This value is then multiplied by GWP_{CH_4} to obtain the baseline emissions from methane destruction ($BE_{MR,y}$) in metric tons of CO_2e . A 95 percent confidence interval for methane concentration data was calculated in accordance with ACM0008 because monitoring was not continuous in frequency.

There are three sources of GHG emissions due to the project activity: CO_2 emissions from use of additional energy for the capture and use of mine methane (PE_{ME}); CO_2 emissions from destruction of methane (PE_{MD}); and emissions from uncombusted methane (PE_{UM}). All project emissions of CO_2 associated with energy use were accounted for in the initial verification of the verification period covered by this report; accordingly, no project emissions of CO_2 from purchased electricity or fossil fuel combustion are quantified in the current reporting period and PE_{ME} is equal to zero. First Environment confirmed that the accounting of project emissions from energy use in the previous verification was complete and that no additional sources needed to be monitored relative to the six additional wells that are the subject of this verification.

Other sources of project emissions are calculated from the monitored gas flow and methane concentration data, and are multiplied by an appropriate emission factor. Project emissions of uncombusted methane are determined from the default destruction efficiency for pipeline injection provided by ACM0008. For the current reporting period, the concentration of non-methane hydrocarbons in mine gas was less than the one percent threshold indicated in the methodology; therefore, these combustion emissions were excluded from the calculation of total project emissions.

The verification process focused on the assessment of calculation spreadsheets to ensure that they were consistent with the formulas and equations described in VMR0001, ACM0008, and the validated VCS PD. Copies of the raw data used in the calculations, including gas flow data, gas analysis data, gas sales invoices, and electricity invoices, were compared with the values used in the final calculations and tested for transcription or mathematical errors. The calculations for the entire period were reviewed as well to determine whether they were free of material misstatement. All calculation methods and emission factors used to determine emission reductions were consistent with those outlined in the validated VCS PD. No material misstatements were observed in the final GHG assertion.

4.3 Quality of Evidence to Determine GHG Emission Reductions and Removals

Blue Source provided adequate documentation for the emission reduction calculations as well as its management systems around the data collection process. Specifically, First Environment was provided a Monitoring Report prepared in accordance with the VCS program template, transparent calculation spreadsheets, and supporting data and documentation associated with gas flow and methane concentration measurements. Raw data was reviewed beginning from its original source of generation to confirm the accuracy of the information flow.

The evidence provided was consistent with the requirements of ACM0008, VMR0001, and the VCS PD and meets generally accepted evidentiary standards for best practice in GHG accounting to sufficiently quantify the GHG emission reductions.

4.4 Non-Permanence Risk Analysis

Not applicable.

5 VERIFICATION CONCLUSION

First Environment was retained to provide verification services for the Project's GHG emission reductions assertion based on the following fundamentals:

- *Level of assurance:* Reasonable assurance.
- *Objectives of verification:* To assure project conformance with the VCS Standard, the VCS methodology revision VMR0001, the CDM methodology ACM0008, and the validated VCS PD.
- *Verification criteria:* VCS Standard, the VCS methodology revision VMR0001, the CDM methodology ACM0008, and the validated VCS PD.
- *Definition of materiality:* Misstatements of more than five percent of the GHG assertion and qualitative non-conformities with the verification criteria are considered material.
- *Scope, including:*
 - o *Boundaries of the assertion:* North Antelope Rochelle mine and methane destruction operations located in Gillette, Wyoming (limited to gas collected from the six wells identified in Table 1 above) as well as gas transport via the commercial pipeline and combustion by end users connected to the natural gas grid;
 - o *The physical infrastructure, facilities, and activities within the assertion:* Gas collection equipment, pipeline injection equipment, and the commercial gas pipeline;

- o *GHG sources, sinks, and reservoirs included within the assertion:* Fugitive emissions of methane from coal mining operations; carbon dioxide emissions due to the operation of project equipment and methane destruction as part of the project activity; and methane emissions from uncombusted methane due to the project activity expressed as carbon dioxide-equivalents; and
- o *The time period for the assertion:* March 28, 2006 through October 31, 2007.

Based on the assessments performed and the historical evidence collected, First Environment concludes to a reasonable level of assurance that the emissions reductions of the Project resulting from the capture and destruction of coal mine methane gas for the period of March 28, 2006 through October 31, 2007 are:

- consistent with the validated VCS PD of March 30, 2009;
- in conformance with the VCS Standard, the VCS methodology revision VMR0001 (Version 1.0), and the CDM methodology ACM0008 (Version 5.0); and
- without material discrepancy, i.e., meeting the minimum level of accuracy of at least 95 percent.

Additionally, the project description deviations reviewed and approved during the current verification process are consistent with the VCS Standard and the VMR0001 and ACM0008 methodologies.

Verification period: From 28 March 2006 to 31 October 2007

Verified GHG emission reductions and removals in the above verification period:

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2006	8,541	1,250	0	7,291
2007	218,410	31,951	0	186,459
Total	226,951	33,201	0	193,750

APPENDIX A – DETAILED RESOLUTION OF FINDINGS

ID	Corrective Action Request	Participant Response	Verification Conclusion
1	The use of monthly reported data obtained from the “Enertia” program (which allocates total sales gas production to each individual well) compared to direct flow meter readings as identified in the validated Project Description is not identified as a Project Description deviation in Section 2.2.2 of the Monitoring Report.	The Monitoring Report was revised to identify the deviation related to gas flow monitoring. Several additional project description deviations relevant to the current reporting period, related to instrument QA/QC activities and the change in the project proponent were also added. Appropriate justification was provided for all new deviations proposed.	Response is acceptable.
2	The Project Proponent(s) are not consistently identified between the Monitoring Report, Validated PD, and VCS Database.	The Monitoring Report was updated to identify Peabody Natural Gas, LLC as the Project Proponent and to include a Project Description Deviation documenting the change in Project Proponent relative to the validated VCS PD.	Response is acceptable. See assessment of deviation in Section 3.3 above. First Environment confirmed with VCS that the VCS Database will be updated to identify Peabody Natural Gas, LLC as the Project Proponent at issuance and registration.
3	Evidence of shut-in or well abandonment has not been provided for well VEG22-30.	The Operators Monthly Report of Well's (Form-2) which is submitted to the Wyoming Oil and Gas Commission was provided from both May and June 2006. The May 2006 Form-2 identifies a status of "Flowing" for well VEG22-30, while the following month, June 2006 indicates a status of "Shut-in." It is therefore concluded that VEG22-30 was shut-in in June 2006.	Response is acceptable.
4	Monthly methane concentration is applied without the application of a 95% confidence level as identified in Section III of the ACM0008 methodology.	Emission reduction calculations were revised to calculate a 95% confidence interval for methane concentration data gathered during the reporting period.	Differences remain between verifier and reporter calculations but are immaterial. Response is acceptable.
5	Sufficient justification for the data source for coal bed methane gas flow applied in emissions reduction calculations has not been provided.	The emission reduction calculations have been revised and now use flow data sourced from the WOGCC Form 2 reports which are reported monthly to the Wyoming Oil and Gas Conservation Commission (WOGCC). Justification for	Response is acceptable.

		the use of this data is that it is regulatory reported data and is governed by Section 13 of the Oil and Gas Commission Rules and Regulations.	
6	Section 3.2 of the Monitoring Report does not identify the following parameters: • $CBM_{ei,y}$ – Eligible CBM captured, sent to and destroyed by use i in the project for year y • PC_{CH_4} – Concentration (in mass) of methane in extracted gas (%) • V_c – Cumulative flow from all wells	The monitoring report was revised to include all parameters previously omitted. Descriptions provided were consistent with the validated VCS PD.	Response is acceptable.
7	Methane sent to pipeline (MMPL) parameter in Section 3.2 of the Monitoring Report does not contain the relevant information in the "Description of measurement methods and procedures to be applied" or "Monitoring Equipment" rows.	The relevant rows of the parameter box for parameter MM_{PL} have been updated to provide the required description of the measurement methods and procedures as well as the relevant monitoring equipment.	Response is acceptable.
8	Sections 1.5 and 3.3 of the Monitoring Report do not address all requirements of the VCS Monitoring Report Template; additionally the date format used on the cover page of the Monitoring Report is inconsistent with Template requirements.	Sections 1.5 and 3.3 and the cover page of the Monitoring Report were revised to address all requirements in the Monitoring Report template.	Response is acceptable.

ID	Clarification Request	Participant Response	Verification Conclusion
1	Please clarify if the surface boreholes drilled for the project activity were cased or not cased.	Blue Source provided clarification that confirmed the wells are cased. Accordingly, leakage emissions are not applicable per ACM0008.	Response is acceptable.
2	Please clarify why the emission reduction calculations do not account for leakage from increased coal production when the project activity baseline scenario is methane venting to the atmosphere, as required per ACM0008, v5.	Blue Source provided clarification that confirmed the leakage emission source is not applicable to the NARM project because it occurs at a surface mine. Accordingly, Option 1 from ACM0008 is selected and a value of zero is applied.	Response is acceptable.